



December 2017

INTERNATIONAL CYANIDE MANAGEMENT CODE

Pioneer Ocean Freight, Transportation Recertification Audit, Thailand, Summary Audit Report

Submitted to:

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REPORT

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- 1 copy – ICMI (+1 Electronic)
- 1 copy – Pioneer Ocean Freight (Electronic)
- 1 copy – Golder Associates Pty Ltd





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APPENDICES

APPENDIX A

Important Information



1.0 INTRODUCTION

Operational information

Name of Transportation Facility:	Pioneer Ocean Freight
Name of Facility Owner:	Not Applicable
Name of Facility Operator:	Pioneer Ocean Freight
Name of Responsible Manager:	Chamlong Phuncharoensin, Deputy Managing Director
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2.0 CYANIDE TRANSPORTATION

2.1 Pioneer Group of Companies

The Pioneer Group of Companies (PCG) was founded in 1972 and today is an international freight forwarder and multi-modal transport operator. The PGC consists of several companies specialising in a range of services including (but not limited to) the following:


- Air freight booking
- Sea freight booking
- Multi-modal transport operations
- Customs clearance
- Packaging
- Warehousing
- Inland transportation
- Container haulage services.

2.2 Pioneer Ocean Freight

Pioneer Ocean Freight (Pioneer) forms the Thailand transportation arm of PGC and has been established for 33 years. The company employs approximately 200 staff including 35 drivers, and has a dedicated fleet of prime movers and trailers each capable of carrying up to 28 tonnes. Pioneer specialises in:

- Customs clearance
- International freight forwarding and multimodal transport

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- Export documentation
- Packing, crating, unpacking and warehousing
- Inland transportation and container trucking
- Air transportation and air courier services.

Pioneer subcontracts the driving of trucks and convoy support vehicles, in part, to Nanon.

2.3 Road transportation

2.3.1 Audit scope

The scope of the Recertification Audit covers the transportation of cyanide to mine sites within Thailand (Chatree Mine) and Laos (Ban Houayxai Gold Mine).

This specifically includes, the following road transporters:

- Pioneer – Oversight of the transportation process
- Nanon (Thailand) Co Limited (Nanon) – subcontractor to Pioneer.

Handling of cyanide within the Port of Laem Chabang is not included within the scope of this audit.

Sepon Gold Mine was included in the last recertification audit but has not been included in this audit as the operation has been in care and maintenance since October 2013.

Chatree Mine went into care and maintenance in August 2016, and since then Pioneer has not been required to transport cyanide to Chatree.

2.3.2 Transporters

2.3.3 Nanon (Thailand) Co Ltd.


Nanon is a private company founded in 2000, under Nanon Group, which is jointly owned and operated by its management team. The Nanon Group owns and operates several local, cross border and international transportation and logistics businesses.

Nanon's services include project handling, road transportation and trucking, supply chain management and customs clearance in Thailand to Laos, Cambodia and Malaysia. They also provide sea and air freight forwarding, warehousing, materials management and consolidation.

2.3.4 Transit storage

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. At no stage is cyanide removed from the trucks or containers prior to unloading at customer mine sites.

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2.4 Auditors findings and attestation

Pioneer Ocean Freight is: [X] in full compliance with
[] in substantial compliance with
[] not in compliance with

The International Cyanide Management Code

Audit Company: Golder Associates Pty Ltd
Audit Team Leader: Jaclyn Ennis-John, Exemplar Global (110895)
Email: jennisjohn@golder.com.au

No significant cyanide exposures and releases were noted as occurring during the audit period.

Name and Signatures of Auditors:

Table with 4 columns: Name, Position, Signature, Date. Row 1: Jaclyn Ennis-John, Lead Auditor and Transport Technical Specialist, [Signature], 5 December 2017

Dates of audit

The Recertification Transport Audit of Pioneer was undertaken over three person days between 4 and 6 July 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 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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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

Pioneer Ocean Freight is in substantial compliance with

Transport Practice 1.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Pioneer, in consultation with its suppliers, has implemented a procedure to guide the selection of transport routes to minimise the potential for accidents and releases or the potential impacts of accidents and releases. Routes were selected by the Pioneer Deputy Managing Director in consultation with Orica and AGR Managers. A procedure is in place that prompts considerations of:

- Areas of population density
- Waterways
- Major intersections
- Road construction and condition (e.g. type of surface, condition, width; pitch and gradient)
- Medical facilities
- Border crossings
- Communications availability
- Other areas of note.

The evaluation and selection of routes is undertaken through a risk assessment process. Route risk assessments have been undertaken for the transport of cyanide to Ban Houayxai and Chatree. The subcontractor, Nanon, is encouraged to participate in the risk assessment process. Route assessments are updated annually.

Pioneer has identified stakeholders in Thailand and Laos, and seeks input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures.

The Pioneer Deputy Managing Director stated that within Thailand and Laos it is the responsibility of the government to consult with the community on the issue of cyanide transportation. For this reason, Pioneer has not directly consulted with the community in regards to route selection.

Convoys are used as a means of managing the risks of the road conditions and responding to emergencies. The route risk assessments identify convoys as a means of managing risks and the convoy procedures are described within the Transport Management Plan (TMP) and in the *Convoy Management Procedure*.

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In addition to the use of convoys, other security measures are implemented including the use of locked and sealed containers.

Pioneer has advised external responders, medical facilities and communities as necessary of their roles during an emergency response. Pioneer has sent the Emergency Response Plan to external stakeholders who have a role in emergency response.

Pioneer has implemented a Service Level Agreement with Nanon that is signed off by the Pioneer Deputy Managing Director. Included in the agreement is the requirement for, amongst other regulatory requirements, compliance with the Code.

In addition to the formal contractual arrangements and assessments, ongoing performance of subcontractors is also managed through the convoy process. All convoy personnel, including subcontractors, are under the direct control of the Convoy Supervisor who is a Pioneer employee.

Nanon is contracted by Pioneer to transport cyanide from the Port of Laem Chabang to the Ban Houayxai Gold Mine, Laos and to Chatree Gold Mine, Thailand. Transportation to Chatree was suspended in August 2016 as the operation went into care and maintenance. Route selection and re-evaluation and identification and notification of stakeholders is completed by Pioneer using Pioneer procedures.

Nanon does not engage subcontractors for the transport of cyanide for Pioneer.

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

Pioneer Ocean Freight is in substantial compliance with

Transport Practice 1.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Pioneer Ocean Freight 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.

Pioneer does not directly operate transport vehicles within the scope of this audit (excluding escort vehicles) as this function is undertaken by its subcontractors. Pioneer does, however, require that its transport subcontractors use only trained, qualified and licensed operators to operate its transport vehicles.

Pioneer has established a process requiring its subcontractors (Nanon) to maintain a list of dedicated drivers approved by Pioneer. Approved drivers have appropriate training and vehicle licences to transport cyanide. The Auditor observed a sample of Drivers Licence for identified drivers and these were in date and appropriate for the type of vehicle and for transporting dangerous goods. Checking of validity of licences is also observed through the completion of Pre-Departure Checklist and Convoy Supervisor Checklist.

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. Pioneer has developed and implemented a training scheme for its subcontractors and escort personnel. The training programme developed by Pioneer includes mandatory training for all staff and subcontractors involved in cyanide transportation.

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Pioneer has implemented a Service Level Agreement with Nanon that is signed off by the Pioneer Deputy Managing Director. Included in the agreement is the requirement for, amongst other regulatory requirements, compliance with the Code. Pioneer conduct routine assessments on the performance of subcontractors.

In addition to the formal contractual arrangements and assessments, ongoing performance of subcontractors is also managed through the convoy process. All convoy personnel, including subcontractors, are under the direct control of the Convoy Supervisor who is a Pioneer employee.

Nanon is contracted by Pioneer to transport cyanide from the Port of Laem Chabang to the Ban Houayxai Gold Mines, Laos to Chatree Gold Mine, Thailand. Transportation to Chatree was suspended in August 2016 as the operation went into in care and maintenance.

Nanon maintains its own database to track the currency of driver permits and licences. Nanon convoy drivers are required to carry valid passports, licences and vehicle registrations to enable them to cross the border into Laos.

The use of only trained, qualified and licensed operators is managed by Nanon, and confirmed and approved by Pioneer. Nanon provides additional driver training, including dangerous goods and response activities. Nanon tracks all driver training.

Nanon does not engage subcontractors for the transport of cyanide for Pioneer.

3.1.3 Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

in full compliance with

Pioneer Ocean Freight is in substantial compliance with

Transport Practice 1.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Pioneer does not directly operate transport vehicles (excluding escort vehicles) as this function is undertaken by its subcontractors. Pioneer does, however, require that its transport subcontractors use equipment designed and maintained to operate within the loads it will be handling when transporting cyanide.

Pioneer requires that subcontractors send maintenance records of vehicles used in the transportation of cyanide.

Pioneer and its subcontractors have procedures to verify the adequacy of the equipment for the load it must bear.

The Convoy Supervisor conducts an inspection of all vehicles prior to convoy departure - this inspection is recorded. The pre-departure inspection includes visual observations on the prime mover and trailer for signs of stress and overloading.

Pioneer has implemented a Service Level Agreement with Nanon, which is signed off by the Pioneer Deputy Managing Director. Included in the agreement is the requirement for, amongst other regulatory requirements, compliance with the Code.

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In addition to the formal contractual arrangements and assessments, ongoing performance of subcontractors is also managed through the convoy process. All convoy personnel, including subcontractors, are under the direct control of the Convoy Supervisor who is a Pioneer employee.

Nanon has prime movers and semi-trailers dedicated for cyanide transportation. A review of the equipment specifications confirmed they are designed to transport a full container of cyanide and the configuration conforms to the maximum gross weight allowed.

Nanon maintains its fleet of trucks in accordance with the servicing frequency specified within the respective maintenance manuals for Volvo and Isuzu. The servicing is undertaken by authorised service agents.

There are additional checks and inspections in addition to scheduled services.

The combined weight of the prime movers, trailers and a single 20 foot container (25 tonne) is within the load 45 tonne load limit.

3.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

in full compliance with

Pioneer Ocean Freight is in substantial compliance with

Transport Practice 1.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Pioneer has procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging. These comprise checks at the Port, along the route, border crossings and checks at the mine site prior to unloading.

Once the containers are loaded onto the trucks at the Port, the Convoy Supervisor conducts a visual inspection of the containers to ensure they are intact and undamaged in accordance with Pioneer Procedures.

Pioneer uses placards or other signage to identify the shipment as cyanide, as required by local regulations and international standards. The following placarding is required within Thailand:

- UN ADR regulation plate on the front and rear of the truck.
■ Emergency Information Panel on each side of the container.

The Pre-Departure Checklist details the placarding standards and requires the Convoy Supervisor to confirm the placarding is present.

Pioneer has implemented a safety programme for cyanide transport that includes the following:

- Pre-departure inspections of vehicles (e.g. vehicle, trailer and container condition, PPE and emergency equipment, communications, seals and EIPs.
■ Preventative maintenance in accordance with the servicing frequency specified within the respective maintenance manuals for Volvo and Isuzu.

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- Limitations on driver hours through management by the Convoy Supervisor. The routes have been appropriately planned with scheduled breaks and designated overnight stops. Driving is conducted during daylight hours and does not typically exceed 200 km or three hours without a break.
- Procedures to prevent loads from shifting. The TMP states that all containers are fixed to the trailers using twist-locks. Prior to loading, the Convoy Supervisor checks the condition of the trucks and the trailers. Following loading, the Convoy Supervisor checks that the load is secured properly.
- Procedures for the modification or suspension of transport. There are procedures in place that note that unforeseen circumstances such as inclement weather, civil unrest or road works can result in modifications being made to the original trip plan after the journey has commenced.
- An Alcohol and Drug Policy advising of the dangers and discouraging its use. The Policy requires supervisors to observe drivers for the effects of drugs and alcohol and take action including counselling if usage is suspected. The Policy requires an annual drug and alcohol check as part of the annual medical check-up.
- Record retention, documenting the above safety programme.

Pioneer has implemented a Service Level Agreement with Nanon that is signed off by the Pioneer Deputy Managing Director. Included in the agreement is the requirement for, amongst other regulatory requirements, compliance with the Code.

In addition to the formal contractual arrangements and assessments, ongoing performance of subcontractors is also managed through the convoy process. All convoy personnel, including subcontractors, are under the direct control of the Convoy Supervisor who is a Pioneer employee.

Nanon is contracted by Pioneer to provide vehicles and drivers to transport cyanide. The trucks are managed in a convoy coordinated by a Pioneer Convoy Supervisor and assisted by a Nanon Convoy Supervisor. The convoy is managed in accordance with Pioneer procedures.

Nanon has a corporate Drug and Alcohol Policy and completed full health assessments before every convoy (blood pressure, temperature, alcohol breath test).

3.1.5 Transport Practice 1.5

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

in full compliance with

Pioneer Ocean Freight is in substantial compliance with

Transport Practice 1.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Pioneer Ocean Freight is in FULL COMPLIANCE with Transport Practice 1.5 requiring the operation follow international standards for transportation of cyanide by sea and air.

Pioneer does not directly transport consignments of cyanide by sea or air within the scope of this audit. Nanon does not transport cyanide by sea or air within the scope of this audit.

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3.1.6 Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

in full compliance with

Pioneer Ocean Freight is in substantial compliance with

Transport Practice 1.6

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Transport vehicles have means to communicate with Pioneer, the mining operation, the cyanide producer and emergency responders.

The following communication equipment is used by the convoy:

- Trucks – two way radios
- Drivers – mobile phone
- Convoy Supervisors – mobile phone and two way radios.

Communication with the supplier and mine site is via email or telephone from the Pioneer Deputy Managing Director. Prior to the departure of the convoy, all communication equipment is tested.

Pioneer has undertaken communication assessments along its transport routes. The availability of the cellular network along a route is checked as part of the initial route assessment process. The Deputy Managing Director advised that a cellular network exists along the current routes and communication within the convoy is by two way radio and by cell phone to outside parties. Different cellular network companies in Thailand and Laos results in the requirement to switch SIM cards within the phones. A procedure is in place to govern this switch.


Pioneer has systems to track the progress of cyanide shipments. These include the use of a cellular phone and email by the Convoy Supervisor to contact the Deputy Managing Director to report progress along the routes. Additionally, a GPS tracking system is implemented by Nanon to visually track shipment and observe drivers during each convoy.

Pioneer implements chain of custody procedures to prevent loss of cyanide during shipment. All containers collected at the Port of Laem Chabang must be checked to ensure that the correct container has been loaded onto the vehicle. The container number and seal number is verified. Once delivered, a mine site representative confirms the consignment was received in good condition and unopened.

Shipping records, Bill of Lading information indicating the amount of cyanide in transit and SDS are available during transport. This is in addition to the Delivery Note (land tracking) and Trucks Bill (customs requirement form) which is carried on each truck and includes details on the cyanide container numbers and volumes of cyanide.

Pioneer has implemented a Service Level Agreement with Nanon that is signed off by the Pioneer Deputy Managing Director. Included in the agreement is the requirement for, amongst other regulatory requirements, compliance with the Code.

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In addition to the formal contractual arrangements and assessments, ongoing performance of subcontractors is also managed through the convoy process. All convoy personnel, including subcontractors, are under the direct control of the Convoy Supervisor who is a Pioneer employee.

Nanon is contracted by Pioneer to provide vehicles and drivers to transport cyanide. The trucks are managed in a convoy coordinated by a Pioneer Convoy Supervisor and assisted by a Nanon Convoy Supervisor. The convoy is managed in accordance with Pioneer procedures.

Nanon implements OneTrack, a GPS tracking system which is used for all of its drivers/trucks. The system includes GPS tracking as well as cameras inside each truck cabin as well as the front and back of trucks/trailers. This system is monitored 24 hours at the Nanon depot. It alerts the head office to issues with the driver or location.

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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

Pioneer Ocean Freight is in substantial compliance with **Transport Practice 2.1**

not in compliance with


Summarise the basis for this Finding/Deficiencies Identified:

Pioneer Ocean Freight is in FULL COMPLIANCE with Transport Practice 2.1 requiring transporters design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures.

There are no interim storage sites between the Port of Laem Chabang and the customer mine sites. However, there are stops along some of the routes. Overnight stops are managed by the Convoy Supervisor (Pioneer) and the Convoy Management Procedure. In these situations there are cyanide specific responsibilities and actions that must be undertaken, these include:

- Parking trucks close together and, if practical, back to back to prevent unauthorised access to the containers
- Washing warning signs on trucks to ensure they are visible and easy to read
- Enforcing driver behaviour standards.

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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

Pioneer Ocean Freight is in substantial compliance with **Transport Practice 3.1**

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Pioneer has developed an Emergency Response Plan (ERP) for the management of cyanide related emergencies associated with cyanide transportation. The ERP has been developed to provide information in a suitable format, which can be used to minimise the adverse effects of a cyanide emergency on people, property and the environment. The ERP was developed by Pioneer with the assistance of Orica and AGR to ensure the ERP is consistent with emergency response guidance issued to Pioneer by the suppliers. Orica and AGR provide oversight of the ERP and are provided opportunity to comment on revisions to the ERP.

The emergency documentation is appropriate for the selected transportation routes.

The emergency documentation considers the physical and chemical form of cyanide. The ERP is specifically drafted around solid cyanide, as it is the only material transported.

The emergency documentation considers the method of transport. Transportation to the mine sites are via maintained, sealed roads using a convoy. The emergency response actions detailed in the ERP are relevant to road transportation between the Port of Laem Chabang and the mine sites. Transportation by rail or interim storage does not occur.


The emergency documentation considers all aspects of the transport infrastructure as they were developed using the route evaluation and risk assessment process referred to in Transport Practice 1.1. This process describes aspects of the transport infrastructure in sufficient detail as well as associated hazards with the respective routes.

The emergency documentation considers the design of the transport vehicles. Cyanide is transported in general purpose Twent-foot Equivalent Units (TEUs) utilising flat top semi-trailers and/or drop deck trailers and are held in place with twist locks and/or quick locks.

The ERP contains specific descriptions of responsibilities and actions for Pioneer and its stakeholders, including hospitals, fire and rescue, police, governments and the mine site customer. The communities have not been allocated an emergency response role by Pioneer and have not been consulted.

Nanon is contracted by Pioneer to provide vehicles and drivers to transport cyanide. They have been provided with a copy of the ERP and follow Pioneers procedures related to cyanide emergency response. Nanon drivers are also provided with a summarised emergency response documentation in the Thai language which remains in the vehicle. The Project Coordinator confirmed that this provided the roles and responsibilities as well as first aid actions based on the ERP and training session.

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3.3.2 Transport Practice 3.2

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

in full compliance with

Pioneer Ocean Freight is in substantial compliance with

Transport Practice 3.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Pioneer provides emergency response training of appropriate personnel. Pioneer has developed and implemented a training scheme for its drivers (including subcontractors) and escort personnel. The training programme includes mandatory training for all staff involved in cyanide transportation, with components focusing on emergency response and first aid.

Descriptions of the specific emergency response duties and responsibilities are detailed within the ERP for police, ambulance, fire service, government agencies, drivers, Convoy Supervisors, mine site customers and Pioneer management.

Pioneer maintains a list of all of the emergency response equipment that should be available during the transport route. The ERP contains a list of response equipment per convoy (checked prior to departure of every trip). These lists are focused on the serviceability of the equipment as well as its presence.

Pioneer has the necessary emergency response and health and safety equipment, including personal protective equipment during transport. Pioneer also has a Pre-Departure Vehicle Checklist, which includes a check of the emergency response equipment. The checklist is completed by the Convoy Supervisor prior to the departure of the convoy.

Pioneer provides initial and periodic refresher training in emergency response procedures including implementation of the ERP. Pioneer has developed and implemented a training scheme for its drivers and escort personnel. The training programme developed by Pioneer includes mandatory training for all staff involved in cyanide transportation. A training matrix details when training is conducted and records are kept.

Pioneer has implemented a Service Level Agreement with Nanon which is signed off by the Pioneer Deputy Managing Director. Included in the agreement is the requirement for, amongst other regulatory requirements, compliance with the Code.

In addition to the formal contractual arrangements and assessments, ongoing performance of subcontractors is also managed through the convoy process. All convoy personnel, including subcontractors, are under the direct control of the Convoy Supervisor who is a Pioneer employee.

Nanon is contracted by Pioneer to provide vehicles and drivers to transport cyanide.

Drivers are trained in accordance with the Pioneer minimum training requirements and their training is provided and tracked by Pioneer using Pioneer's procedures.

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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

Pioneer Ocean Freight is in substantial compliance with

Transport Practice 3.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Pioneer has developed a procedure for notifying the shipper, the receiver/consignee, regulatory agencies, outside response providers, and medical facilities of an emergency. The internal and external contact numbers are listed in an Emergency Contact List in the ERP, which is located in all escort vehicles.

Contact information for potentially affected communities is not provided within the ERP as incidents are coordinated by Government services including communication with communities as required. Route risk assessments did not identify potentially affected communities that required alternate communication mechanisms, such as direct contact by Pioneer in the event of an emergency.


There are provisions to ensure that internal and external emergency notification and reporting procedures are kept current.

The key contact numbers within the ERP are updated annually. The document history section of the ERP details the date of publication, the author, the new revision number and a description of the revision. The ERP was last updated in June 2016.

In addition to the formal review process, Delivery Procedures require the Convoy Supervisor to note any end of delivery remarks, which may include observed changes in contacts and respective telephone numbers during each convoy.

Nanon is contracted by Pioneer to provide vehicles and drivers to transport cyanide. All emergency response procedure development and implementation is undertaken by Pioneer.

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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

Pioneer Ocean Freight is in substantial compliance with

Transport Practice 3.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:


Pioneer Ocean Freight 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.

Pioneer has procedures for remediation, such as recovery or neutralisation of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris. The ERP is focussed on first response procedures in the event of an emergency and minor spill recovery. This covers the recovery, and to a lesser degree, the neutralisation of solutions and solids, as well as decontamination of equipment. The ERP notes that technical issues relating to the decontamination of soils and management and disposal of clean-up debris are conducted under the advice of the cyanide manufacturers.

Pioneer prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water. This is stated in the ERP and reinforced in training.

Nanon is contracted by Pioneer to provide vehicles and drivers to transport cyanide. All emergency response procedure development and implementation is undertaken by Pioneer.

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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

Pioneer Ocean Freight is in substantial compliance with

Transport Practice 3.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

The ERP contains provisions for annual review or incorporation of learnings garnered from emergency response exercises and drills, incidents or additional information obtained from other external sources (e.g. manufacturers). A review of the document history shows that there have been four reviews of the ERP since 2014. The cover page of the ERP highlights that the next document review date.

Pioneer has provisions for periodically conducting mock emergency drills and they are being implemented. An Emergency Response Roles and Responsibilities course is used to train Pioneer and subcontractors in their roles and responsibilities.


Drivers and escort personnel complete mandatory training. The training matrix details when training is conducted and records are kept.

The ERP contains provisions for periodically reviewing and evaluating the ERP's adequacy and they are being implemented. The ERP states the emergency response procedures are to be reviewed and evaluated following any incident that triggers implementation of the ERP, training drills and audits. Recommendations arising from the investigation following an incident are to be included in the ERP.

Nanon is contracted by Pioneer to provide vehicles and drivers. Drivers are trained in accordance with the Pioneer minimum training requirements and their training is provided and tracked by Pioneer using Pioneer's procedures.

All emergency response procedure development, implementation and review is undertaken by Pioneer.

Pioneer Ocean Freight
Name of Facility


Signature of Lead Auditor


5 December 2017
Date



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.

Pioneer Ocean Freight
Name of Facility



Signature of Lead Auditor

5 December 2017
Date



Report Signature Page

GOLDER ASSOCIATES PTY LTD

A handwritten signature in blue ink that reads "Jaclyn Ennis-John".

Jaclyn Ennis-John
ICMI Lead Auditor and Transport Technical Specialist

CC/JEJ_MW/hn

A.B.N. 64 006 107 857

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APPENDIX A

Important Information



IMPORTANT INFORMATION RELATING TO THIS REPORT

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

This Report constitutes or is part of services (“Services”) provided by Golder to its client (“Client”) under and subject to a contract between Golder and its Client (“Contract”). The contents of this page are not intended to and do not alter Golder’s obligations (including any limits on those obligations) to its Client under the Contract.

This Report is provided for use solely by Golder’s Client and persons acting on the Client’s behalf, such as its professional advisers. Golder is responsible only to its Client for this Report. Golder has no responsibility to any other person who relies or makes decisions based upon this Report or who makes any other use of this Report. Golder accepts no responsibility for any loss or damage suffered by any person other than its Client as a result of any reliance upon any part of this Report, decisions made based upon this Report or any other use of it.

This Report has been prepared in the context of the circumstances and purposes referred to in, or derived from, the Contract and Golder accepts no responsibility for use of the Report, in whole or in part, in any other context or circumstance or for any other purpose.

The scope of Golder’s Services and the period of time they relate to are determined by the Contract and are subject to restrictions and limitations set out in the Contract. If a service or other work is not expressly referred to in this Report, do not assume that it has been provided or performed. If a matter is not addressed in this Report, do not assume that any determination has been made by Golder in regards to it.

At any location relevant to the Services conditions may exist which were not detected by Golder, in particular due to the specific scope of the investigation Golder has been engaged to undertake. Conditions can only be verified at the exact location of any tests undertaken. Variations in conditions may occur between tested locations and there may be conditions which have not been revealed by the investigation and which have not therefore been taken into account in this Report.

Golder accepts no responsibility for and makes no representation as to the accuracy or completeness of the information provided to it by or on behalf of the Client or sourced from any third party. Golder has assumed that such information is correct unless otherwise stated and no responsibility is accepted by Golder for incomplete or inaccurate data supplied by its Client or any other person for whom Golder is not responsible. Golder has not taken account of matters that may have existed when the Report was prepared but which were only later disclosed to Golder.

Having regard to the matters referred to in the previous paragraphs on this page in particular, carrying out the Services has allowed Golder to form no more than an opinion as to the actual conditions at any relevant location. That opinion is necessarily constrained by the extent of the information collected by Golder or otherwise made available to Golder. Further, the passage of time may affect the accuracy, applicability or usefulness of the opinions, assessments or other information in this Report. This Report is based upon the information and other circumstances that existed and were known to Golder when the Services were performed and this Report was prepared. Golder has not considered the effect of any possible future developments including physical changes to any relevant location or changes to any laws or regulations relevant to such location.

Where permitted by the Contract, Golder may have retained subconsultants affiliated with Golder to provide some or all of the Services. However, it is Golder which remains solely responsible for the Services and there is no legal recourse against any of Golder’s affiliated companies or the employees, officers or directors of any of them.

By date, or revision, the Report supersedes any prior report or other document issued by Golder dealing with any matter that is addressed in the Report.

Any uncertainty as to the extent to which this Report can be used or relied upon in any respect should be referred to Golder for clarification.

At Golder Associates we strive to be the most respected global company providing consulting, design, and construction services in earth, environment, and related areas of energy. Employee owned since our formation in 1960, our focus, unique culture and operating environment offer opportunities and the freedom to excel, which attracts the leading specialists in our fields. Golder professionals take the time to build an understanding of client needs and of the specific environments in which they operate. We continue to expand our technical capabilities and have experienced steady growth with employees who operate from offices located throughout Africa, Asia, Australasia, Europe, North America, and South America.

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