



June 2009

INTERNATIONAL CYANIDE MANAGEMENT CODE
CYANIDE TRANSPORTATION AUDIT

Transport Terrassement Minier
Conakry, Republic of Guinée
Certification Audit
Summary Audit Report

Submitted to:

International Cyanide Management Institute
(ICMI)
888 16th Street, NW – Suite 303
Washington, DC 20006
UNITED STATES OF AMERICA

Transport Terrassement Minier
BP: 463
Conakry
Republic de Guinée
West Africa

REPORT

Report Number: 097641060 007 R Rev0

Distribution:

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TRANSPORT TERRASSEMENT MINIER, CONAKRY, SUMMARY AUDIT REPORT

Record of Issue

Company	Client Contact	Version	Date Issued	Method of Delivery
ICMI	Norm Greenwald	097641060 007 R Rev 0	15 June 2009	Electronic and Hard Copies
TTM	Eric Rafin	097641060 007 R Rev 0	15 June 2009	Electronic and Hard Copies
AGR	Peter Cooper	097641060 003 R Rev 0	15 June 2009	Electronic and Hard Copies



1.0 SUMMARY AUDIT REPORT FOR CYANIDE TRANSPORTATION OPERATIONS

Name of Transportation Facility:	Transport Terrassement Minier
Name of Facility Owner:	Transport Terrassement Minier
Name of Facility Operator:	Transport Terrassement Minier
Name of Responsible Manager:	Eric Rafin, Director, Transport Terrassement Minier
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2.0 LOCATION DETAIL AND DESCRIPTION OF OPERATION:

2.1 Background

2.1.1 Transport Terrassement Minier

Transport Terrassement Minier (TTM) is a Guinean company with its head office located in the Matoto region of Conakry. Further support offices and workshops are spread through Guinea to service the company's three core areas of business.

TRANSPORT - Transportation. Specialised transport services handling dangerous goods and other transport services to the mining and resource industries.

TERRASSEMENT - Earthworks. TTM operate a fleet of earth moving equipment which service contracts with the Government for road building and repairs, the mining industry for building of haul roads and access roads as well as earthworks at mining operations for tailings dams and heap leach installations.

MINIER - Mining. This section of the business services mining contracts for movement of ore from mining operations to the processing plant. This includes the provision of a full service agreement which includes the supply of labour, equipment and plant servicing.

TTM was founded in 1997; the company has 348 employees as well as operating a range of transport, earth moving and mining equipment. As a company based in the developing country of Guinea, TTM prides itself in its opportunity of employing locally based personnel and assisting in the development of their skills.

2.2 CSBP Ltd and Australian Gold Reagents Pty Ltd

AGR is the management company of the unincorporated joint venture between CSBP Ltd (CSBP) and Coogee Chemicals Pty. Ltd. CSBP, a subsidiary of Wesfarmers Ltd., is the major participant in the venture and acts as both plant operator and sales agent.

Coogee Chemicals is a local manufacturer and distributor of industrial chemicals.

The AGR cyanide production facility is located within CSBP's fertiliser and chemicals complex at Kwinana, some 40 km south of Perth within the state of Western Australia. AGR produces and transports two different



forms of sodium cyanide from the Kwinana production facility, namely solution and solids. Sodium cyanide solution is produced as a 30% liquid and solid sodium cyanide as a >97%, white briquette.

AGR in its capacity as the sales agent is responsible for the overall management of the sodium cyanide transportation activities including emergency response.

2.3 Sodium Cyanide Transportation

At the time of the audit, cyanide transported by TTM originated from the AGR cyanide production facility at CSBPs Kwinana complex. At AGR, solid cyanide is packaged in intermediate bulk containers (IBCs), which are in turn packed into a freight (shipping) container to be transported by sea from the Port of Fremantle to the Port of Autonom De Conakry. A maximum of 20 IBCs are packed into a freight container with a maximum gross weight of 28 tonnes.

Shipping between the Port of Fremantle and the Port of Autonom De Conakry is conducted by Maersk Australia Pty Ltd (Maersk).

Prior to the arrival at the Port of Autonom De Conakry, TTM ensures that the shipping documentation is in order and the goods are pre-cleared to allow prompt handling of the product through the Port. Upon arrival at Port of Autonom De Conakry, the off loading of all containers is performed by the Port. TTM collects the containers within four to five days of arrival and transports the containers to the designated area at TTM's Transport depot where the containers are stored on the trailer in preparation for departure to the customer mine sites the following morning. At the time of the audit, these mine sites were:

- AngloGold Ashanti's Siguiri Gold Mine in Mali. This mine is located three days travel from the Port of Conakry.

2.4 Transit Storage

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. Storage in transit does occur at the Port of Conakry for four to five days while formalities such as customs clearance and carrier releases are performed. Once formalities are complete, the cyanide containers are collected from the Port and taken to the TTM Transport Yard where they are stored on the truck overnight in preparation for convoy departure at 0500 hrs the following morning. At no stage is cyanide removed from the trucks or containers prior to unloading at customer mine sites.



**TRANSPORT TERRASSEMENT MINIER, CONAKRY,
SUMMARY AUDIT REPORT**

**SUMMARY AUDIT REPORT
AUDITORS FINDINGS**

TTM is: in full compliance with **The International Cyanide Management Code**
 in substantial compliance with
 not in compliance with

Audit Company: Golder Associates
Audit Team Leader: Edward Clerk, CEnvP (112), RABQSA (020778)
Email: eclerk@golder.com.au

Name and Signatures of Other Auditors:

Name	Position	Signature	Date
Edward Clerk	Lead Auditor and Technical Specialist		15 June 2009
Jaclyn Goad	Auditing Support		15 June 2009

Dates of Audit:

The Certification Audit was undertaken within two days (4 person-days) between 2 April 2009 and 3 April 2009.

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.

Transport Terrassement Minier

Name of Facility

14/8/2009

Signature of Lead Auditor

IAN BARRIE MURIE
 16 Emerald Terrace
 West Perth Western Australia
 General Public Notary





PRINCIPLE 1 – TRANSPORT

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

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

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

TTM has developed 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. TTM, in consultation with its cyanide supplier and mining company customer, has implemented the procedure and conducted route surveys for the selected route. A risk assessment is conducted on hazards identified during the route survey. The results of the risk assessment are used to control measures.

There is only a single route available for the delivery of cyanide from the Port of Autonom De Conakry to AngloGold Ashanti's Siguiri mine which is located 815 km to the east, north east of Conakry. The route selected corresponds to the Trans ECOWAS (Economic Community of West Africa States) route or the main commercial route linking Guinea, Mail, Bukina Faso, Ghana and the Ivory Coast.

The Ministry of the Interior have also issued TTM with a decree specifying that cyanide is transported along the ECOWAS route.

TTM has implemented a procedure requiring annual route surveys and has a process of obtaining feedback on route conditions after each convoy.

TTM has documented measures taken to address risks identified with the selected routes within a Transport Management Plan.

TTM has consulted as necessary with stakeholders and applicable governmental agencies in the selection of routes and development of cyanide management measures.

Convoys are used as a means of managing the risks of the road conditions and responding to emergencies. Security is managed through the use of government escorts.

TTM, in conjunction with AGR and AngloGold Ashanti Siguiri Gold Mine has advised external responders and medical facilities as necessary of their roles during an emergency response.

In the event of an incident, primary emergency response is coordinated by the TTM Escort Chief using TTM personnel present within the convoy. Secondary response activities are conducted by TTM personnel and supported by the supplier and AngloGold Ashanti Siguiri Gold Mine.

TTM do not subcontract cyanide handling or transport activities.

Transport Terrassement Minier

Name of Facility

Signature of Lead Auditor

15 June 2009

Date



TRANSPORT TERRASSEMENT MINIER, CONAKRY, SUMMARY AUDIT REPORT

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

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

TTM uses dedicated drivers that have appropriate training and vehicle licences to transport cyanide. Mali and Guinea are both members of ECOWAS and drivers' licences issued in Guinea are valid in other ECOWAS member countries.

Guinea and Mali do not have any dangerous goods legislation, despite this, dangerous goods training of all cyanide drivers is provided by TTM.

All personnel 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 provided by TTM.

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:

TTM is in FULL COMPLIANCE with Standard of Practice 1.3 requiring that transport equipment is suitable for cyanide shipment.

TTM only uses equipment designed and maintained to operate within the cyanide loads it will be handling. TTM has five Renault Magnum and Premium prime movers and seven two axle skeleton 20 foot transport trailers dedicated to cyanide transportation. The design specification of the prime movers and trailers is appropriate for the cyanide transport task and the loads are well within the ECOWAS limit for public roads (11.5 tonnes per axle).

No other load bearing equipment is used by TTM.

TTM has a preventative maintenance program in place that conforms with Renault's recommendation. Outside of the preventative maintenance program, records indicate drivers actively report defects and that those defects are rectified.

TTM maintains records of vehicle and trailer specifications and maintenance history.

Transport Terrassement Minier

Name of Facility

Signature of Lead Auditor

15 June 2009

Date



TRANSPORT TERRASSEMENT MINIER, CONAKRY, SUMMARY AUDIT REPORT

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:

TTM is in FULL COMPLIANCE with Standard of Practice 1.4 requiring the operation develop and implement a safety program for transport of cyanide.

TTM has procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging. The Bill of Lading is stamped by the Port Authority indicating the containers have been delivered undamaged with the seals intact. The document is also stamped by the Mine Site Transit Officer upon arrival at the mine site. The stamp indicates that the containers have been delivered undamaged with the seals intact.

TTM transport cyanide for Code certified cyanide producers, who have systems in place to ensure their containers are labelled in accordance with the International Maritime Dangerous Goods (IMDG) Code and as required by local regulations or international standards. Mali and Guinea do not have any dangerous goods legislation. As a control measure, the cyanide is trucked in convoy under the escort of persons who have received training in cyanide emergency response and dangerous goods training.

TTM has implemented a safety program for cyanide transport that includes:

- Vehicle inspections.
- Preventative maintenance.
- Limitations on operator or drivers' hours.
- Procedures to prevent loads from shifting.
- Procedures to modify or suspend transport if conditions such as severe weather or civil unrest are encountered.
- Drug abuse prevention.

Safety records are maintained by TTM.

Transport Terrassement Minier

Name of Facility

Signature of Lead Auditor

15 June 2009

Date



TRANSPORT TERRASSEMENT MINIER, CONAKRY, SUMMARY AUDIT REPORT

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:

Standard of Practice 1.5 requiring the operation to follow international standards for transportation of cyanide by sea and air is NOT APPLICABLE to TTM.

TTM does not transport consignments of cyanide by sea or air within the scope of this audit. Consignments of cyanide transported by TTM arrive in Guinea via the Port of Autonom De Conakry from AGR who is a Code certified cyanide producer. As a Code certified cyanide producer, AGR has systems in place to ensure their containers are labelled in accordance with the International Maritime Dangerous Goods (IMDG) Code and as required by local regulations or international standards.

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

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.6

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

TTM is in FULL COMPLIANCE with Standard of Practice 1.6 requiring the operation track cyanide shipments to prevent losses during transport.

All vehicles communicate through the use of cell phones. The phone type, presence and call credit levels are checked as part of a pre-start check.

TTM have identified communication blackout areas along transport routes. The entire route from the Port of Autonom De Conakry to AngloGold Ashanti's Siguiri Gold Mine has cell phone coverage from one of four cell phone providers (Orange, Sotelgui, Areeba and Cellcom) but no individual cell phone provider has 100% coverage of the route.

TTM escort personnel carry three phones (Orange, Areeba and Cellcom) in the front and rear escort vehicle to ensure communication coverage across the entire route.

Cell phones are used to track convoy progress. During the convoy, the Escort Chief telephones the convoy position to TTM every time the convoy stops. TTM then email the convoy progress to the Siguiri Supply Department, AGR and AGR's Consultant in Ghana at the end of each day.

TTM implement chain of custody procedures to prevent loss of cyanide during shipment. The cyanide supplier advises TTM and the customer mine site via email, shipping departure dates and attaches the Supplier packing list and Ship of Lading documentation. Both documents note the container numbers and seal numbers.

Transport Terrassement Minier

Name of Facility

Signature of Lead Auditor

15 June 2009

Date



TRANSPORT TERRASSEMENT MINIER, CONAKRY, SUMMARY AUDIT REPORT

The Bill of Loading is stamped by the Port Authority indicating the containers have been delivered undamaged with the seals intact. The document is also stamped by the Mine Site Transit Officer upon arrival at the mine site. The stamp indicates that the containers have been delivered undamaged with the seals intact.

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

Transport Terrassement Minier

Name of Facility

Signature of Lead Auditor

15 June 2009

Date



PRINCIPLE 2 – INTERIM STORAGE

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

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

in full compliance with

The operation is

in substantial compliance with

Transport Practice 2.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the Standard of Practice 2.1 requiring transporters design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures is NOT APPLICABLE to TTM.

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. Storage in transit does occur at the Port of Autonon De Conakry for four to five days while formalities such as customs clearance and carrier releases are performed. Once formalities are complete, the cyanide containers are collected from the Port and taken to the TTM Transport Yard where they are stored on the truck overnight in preparation for convoy departure the following morning. At no stage is cyanide removed from the trucks or containers prior to unloading at customer mine sites.

Transport Terrassement Minier

Name of Facility

Signature of Lead Auditor

15 June 2009

Date



PRINCIPLE 3 – EMERGENCY RESPONSE

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

Transport Practice 3.1: Prepare detailed Emergency Response Plans for potential cyanide releases.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

TTM has developed detailed documents to cover emergency response for potential cyanide releases for cyanide transportation within Guinea and Mali. The information is contained within an Emergency Response Plan and route specific Transport Management Plan.

The Transport Management Plan and Emergency Response Plan are based on road transportation between the Port of Autonom De Conakry and AngloGold Ashanti's Siguiri Gold Mine in Mali. The plans are appropriate for the selected transportation routes and they consider relevant aspects of the transport infrastructure. The route evaluation process, route hazard/risk assessment process, and operational experience was used by TTM and AGR to identify three likely emergency scenarios:

- Transport incident – Vehicle Rollover caused by pulling over to stop on soft edge along a sealed road. Sea container intact with no spill or product release.
- Transport incident – Vehicle Rollover caused by crash or crash avoidance with another vehicle. Sea container intact with no spill or product release.
- Transport incident – Vehicle Rollover caused by crash or crash avoidance with another vehicle. Sea container damaged resulting in spill of product released from container.

The plans consider the physical and chemical form of cyanide and design of the transport vehicle. Storage facility emergency response plans were not developed, as cyanide is not stored at an interim storage facility between the Port and the mine site destination.

The Transport Management Plan and Emergency Response Plan include descriptions of response actions, as appropriate for the anticipated emergency situation. External responders identified in the documents are aware of their role in an emergency.

Transport Terrassement Minier

Name of Facility

Signature of Lead Auditor

15 June 2009

Date



TRANSPORT TERRASSEMENT MINIER, CONAKRY, SUMMARY AUDIT REPORT

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

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

TTM provides emergency response training for all convoy personnel, including police and customs officers involved in the convoy. TTM has developed a Training Needs Analysis for all transport personnel. This matrix identifies the needs of training for escort personnel and convoy drivers.

The Emergency Response Plan does identify the specific emergency response duties and responsibilities of personnel for the three scenarios identified. Descriptions of the specific emergency response duties and responsibilities for TTM and external resources are detailed within the Emergency Response Plan. The cyanide training provides additional detail of the roles and responsibilities.

TTM has a checklist for necessary emergency response and health and safety equipment, including personal protective equipment that is checked before each convoy.

TTM provides initial and periodic training for all their convoy personnel. The TTM Training Matrix includes all the training required for the escort team personnel and 25 drivers.

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

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

The Emergency Response Plan contains procedures and current contact information for notifying the shipper, the receiver/consignee, outside response providers, and medical facilities of an emergency.

TTM has systems in place to ensure that internal and external emergency notification and reporting procedures are kept current.

The Review of Documents procedure requires TTM to update and assess the Emergency Response Plan and Transport Management Plan annually. These documents contain emergency response numbers and reporting procedures.

Transport Terrassement Minier

Name of Facility

Signature of Lead Auditor

15 June 2009

Date



TRANSPORT TERRASSEMENT MINIER, CONAKRY, SUMMARY AUDIT REPORT

Transport Practice 3.4: Develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

TTM 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. Part B (Cleanup and Containment) of the Transport Management Plan contains relevant information on:

- Handling Hazards and Precautions.
- Containment.
- Recovery and Treatment of Spills.
- Water Resource Treatment.
- Neutralisation.
- Reporting and Investigation.

The Escort Chiefs and drivers have emergency response training for their limited role in an incident. Secondary Emergency Response Teams undertake the actual recovery and clean up.

Remediation and neutralisation processes are also detailed in the emergency response section of the cyanide awareness training program.

Section 7 of the Transport Management Plan contains a statement prohibiting the use of ferrous sulphate to treat cyanide that has been released into surface waters.

The AGR Sales and Operating Agent stated that the emergency response section of the cyanide awareness training program provided to all TTM Drivers and Escort team personnel details that chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide should not be released into surface water.

Transport Terrassement Minier

Name of Facility

Signature of Lead Auditor

15 June 2009

Date



TRANSPORT TERRASSEMENT MINIER, CONAKRY, SUMMARY AUDIT REPORT

Transport 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

Transport Practice 3.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

TTM has provisions for periodically reviewing and evaluating the Plan's adequacy. The Review of Documents procedure requires TTM to update and assess the Emergency Response Plan and Transport Management Plan annually. These documents are currently less than one year old. The procedure notes that the documents are due for review in April 2010.

TTM completes annual mock drills as part of the practical section of the cyanide awareness training. All convoy personnel, including police and customs officers participate in this training.

The Emergency Response Plan contains provisions for conducting a review after an incident. At the time of the audit, TTM had not had any incidents involving the transportation of Cyanide.

Transport Terrassement Minier

Name of Facility

Signature of Lead Auditor

15 June 2009

Date



TRANSPORT TERRASSEMENT MINIER, CONAKRY, SUMMARY AUDIT REPORT

Report Signature Page

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Transport Terrassement Minier

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June 2009
Report No. 097641060 007 R Rev0





APPENDIX A

Limitations

LIMITATIONS

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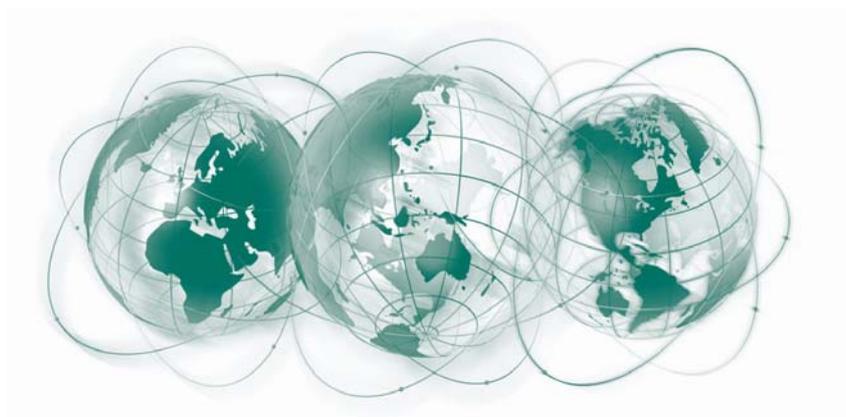
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