

***INTERNATIONAL CYANIDE
MANAGEMENT INSTITUTE***

***Transportation Summary
Recertification Audit Report***

***UNITED MINING SUPPLY
CONACKRY GUINEA***

4th – 7th MARCH 2018

For

International Cyanide Management Institute

1400 I Street, NW, Suite 550
Washington, DC 20005, USA
Phone: 202-495-4020
Fax: 202-835-0155
E-mail: info@cyanidecode.org



SUMMARY AUDIT REPORT
United Mining Supply
4-7 March 2018

Name of Operation: United Mining Supply
Name of Operation Owner: United Mining Supply
Name of Operation Operator: United Mining Supply
Name of Responsible Manager: Mrs Sylvie Pelletier,
QHSE Director
Address: Immeuble Wazni Tombo 1, Kaloum
BP 2162 – Conakry
Country: Guinea
Telephone: +224 622 97 11 02 / +224 622 97 11 06
Fax:
E-Mail: sylvie.pelletier@ums-cky.com

Location detail and description of operation:

United Mining Supply are contracted as a cyanide transporter for Orica and as they act as a broker for many mines suppliers in Guinea, solid cyanide (briquettes) transported by road from Conakry to SMD Lero. UMS cyanide operations is based in Conakry, UMS have 4 yards each dedicated for specific service the yard audited is the yard that receive and dispatch Cyanide, is located 6 kilometers from Conakry main port Immeuble Wazni Tombo 1, Kaloum BP 2162 – Conakry

Cyanide is received at the port of Conakry by sea in containers, which each hold 20 one-ton boxes of solid briquette cyanide. The containers are offloaded at the ports by Stevedores and segregated from other containers. A due diligence has been done on the port by the lead Auditor ED Clark for Orica to be part of supply chain of the cyanide producers and consignors bringing the cyanide in. For the purposes of Cyanide Code transportation compliance, UMS responsibilities commence on collection of the containers from port. Containers are delivered from the Quay to the stevedores where they are stacked and stored separately. Control and monitoring of the containers is undertaken by stevedores who subscribe to the IMDG Code. UMS Cyanide Code responsibilities commence once they take the containers from the stevedores storage area.

UMS vehicles collect the containers with the documentation and manage them under a Transport Management Plan (jointly agreed between the supplier and the mine).

The containers are transported in escorted convoy to the mine sites.

Each truck has a driver, who is accompanied by an assistant.

Each convoy is made of 2 escort vehicles and 2 safety officers

The safety officer manages communications between the trucks, the escort vehicles and the convoy manager, and monitors the driver.

The convoy consist of a convoy manager, assistant convoy manager, a cyanide first aid, safety officers, a mechanic, cyanide emergency response equipment for spills and releases and medical equipment to treat cyanide exposures (splashes, skin exposures, inhalations and ingestions).

The convoys include an armed police escort, Military, customs and officials from the ministry of mines and environment.

UMS have over 600 vehicles only 10 are dedicated for he cyanide transport also acquired 2 helicopters and one beach craft for the evacuation of casualties during emergencies

**SUMMARY AUDIT REPORT
United Mining Supply
4-7 March 2018**

This operation has not experienced compliance problems during the previous three year audit cycle.

Auditor's Finding

This operation is

- in full compliance
- in substantial compliance *(see below)
- not in compliance

with the International Cyanide Management Code.

This operation has not experienced compliance problems during the previous three year audit cycle.

Audit Company: Crown Transport & Logistics
Audit Team Leader: Ghassan Husseini
E-mail: ghass@ctlwa.com

Name and Signature of Lead & Technical Transport Auditor:

Name Ghassan Husseini

Signature

Date 10-3-2018

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.

Date of audit: 4th -7th March 2018

Signed

Ghassan Husseini

Lead Auditor

Date 10-3-2018

1. TRANSPORT: *Transport cyanide in a manner that minimizes the potential for accidents and releases.*

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

X in full compliance

The operation is in substantial compliance **with Transport Practice 1.1**

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Journey plan has date of departure, where it is going, final destination, trip distance, loading and discharge order, truck number, remote number

If they have a comment for change of route, condition and emergency numbers as well.

TMP provides details black out areas are identified and managed, route are selected.

Also identifies rest point and rest points are audited as fit for purpose.

Due diligence on the port operation is done by ORICA.

Moreover, evaluation of roads, surveys, route risk assessment and also an update on the road changing conditions. routes used for cyanide deliveries.

Feedback on the route is received from drivers via journey plan.

The ERP and Transport Management Plan (TMP) require that routes are reassessed each month or more frequently if the season changes / requires.

During the convoy the Escort Commander provides real time risk management on the route condition.

Feedback on the route is also documented in the End of Mission Report produced by the Escort Commander following each voyage and clearly stated and elaborated in the journey plan.

This is used as an awareness tool for convoy personnel and discussed during the pre-trip briefing of the next convoy.

The feedback / journey plan document take into consideration everything from road conditions, to population, to time of transit, where delay came from and possible solution to expedite the delivery.

The data from this sheet is transferred into an excel sheet and analysis is done to review and revise the level of risk on the road and if the risk or the number of hazards is increasing or reducing.

Convoy managers or escort takes this into account in their journey planning.

Route risk assessments are currently reviewed yearly.

All feedback is documented by Convoy Managers in the journey plan and transferred into the risk assessment during the yearly review.

Full routes are re-evaluated every five years although no alternative route is available

Road Survey and risk assessment is more of hazard identification and mitigation measures the identified hazard are, link to hazard map and updating the risk assessment. Population density, bridges, water bodies, black points, and black outs.

Also for the control quality department to ensure the route risk is evaluated.

The Road Survey procedure identifies steps to be taken in the assessment of transport routes and identifies personnel responsible for undertaking each step.

Utilisation des rest points also states the rest points area, the risk in these areas, how the rest point must be used.

Which includes detailed route and rest stops and further identifies road hazards such as slippery roads, bridges, population densities, customs barriers, road construction, cyclists, traffic congestion, standard caution, heavy rain, cattle crossing, children, bridges etc.

Fonctionnement cellule OBC is to analyze the road risk. Includes a sample of the road hazard mapping from Conakry to Lero. ,

Risk Assessment Conakry (Km536)-Mamou-Dinguiraye-Léro-usine SMD is route risk assessment from Conakry to Lero that considers the risks and the assessment of the risks as well.



**SUMMARY AUDIT REPORT
United Mining Supply
4-7 March 2018**

Transport management plan ensures that the route has been analyzed in order to minimize the potential and impacts for accidents and releases.

Also ensures road risk assessment is used with infrastructure and condition is analyzed and controlled.

Each delivery is undertaken via convoy.

UMS have also developed a list of authorized rest & stop points that can be used along transport routes.

The road risk assessment highlights areas of significant population density and the control measures needed to address the potential for accidents and releases or the potential impacts of accidents and releases.

Feuille de route et PDV identifies the road condition and the hazards associated with it that was picked up during escort

UMS seek input from authorities, they have authorization letters from ministry of Health and public safety respectively

. Ministry for Health and the Public Health.

Subject: Transport of cyanide. 12 December 2013.

High Command of the National Police.

Subject: Transport of cyanide. 12 December 2013.

UMS seeks input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures.

The survey team meet to discuss issues or concerns with the client and drivers.

On completion, copies of the Survey Report are sent to the mine site and external responders for comment and advice.

Prior to any voyage departure,

the ERP contains a list of contacts including the client that positive communication must be checked with any additional issues with the proposed route can be addressed at this stage.

The Ministry for Health and the Public Health and High Command of the National Police have also been consulted by UMS.

- The community is consulted and involved limiting their role to crowd control and not to use any water during emergency until approved by the authority. UMS sent letter to all communities that they pass through their territories seeking cooperation and explaining the dangers of cyanide emphasizing the core responsibility of the community is not to get close or involved during an incident and not to use any ground or surface water until it is declared safe to do so by the authority.

Furthermore, the Minister of the Environment of Guinea are consulted on routes, especially considering the emergency response

UMS has advised external responders and medical facilities as necessary of their roles and/or mutual aid during an emergency response.

Prior to departure, contact is made with specified stakeholders detailed in the Emergency Response Plan (ERP).

contact list has been updated periodically external responders are advised of their roles during an emergency response through letters and training coordinated by UMS.

Police undergo awareness before participating in convoys.

In the event of an emergency, they primarily provide protection functions which is not outside the scope of their normal roles.

External agencies including police, fireman, hospital etc.

are also involved with incident scenario training simulations at least once per year.

UMS has sent letter to various community explaining the dangers of cyanide and the emergency response and the first aid needed and has sent letters to most of the communities' leaders and stakeholders that the convoy pass through.

The Ministry of Security granted permission for the transport of dangerous goods

The primary role of police is to provide protection in the event of an emergency.

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

X in full compliance with

The operation is in substantial compliance **with Transport Practice 1.2**
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

UMS only enroll qualified and trainer personnel

All truck drivers have a permit C1 valid for 3 years that allows the driver to drive trucks above the weight of 19 tons and hold at least a Middle School Leaving Certificate and they should be able to read and write.

Training done are: firefighting, transportation of hazardous materials training, cyanide transport training, and first aid training, defensive driving course.

Minimum training requirements have been established for cyanide drivers:

- First aid
- Training on cyanide awareness, DDC
- Site induction
- Chemical response
- Responding to accidents 1 incidents
- Crowd control

Transport management plan indicates that UMS uses only trained, qualified and licensed operators...

Tableau de suivi des formations du personnel shows the attendees matrix of the annual training done.

An internal test is done as per procedure.

Drivers and Escort team have been trained to perform their jobs in a manner that minimizes the potential for cyanide releases and exposures.

This process is complemented with structured training.

Emergency simulations drill are carried out four times per year where specific aspects of the emergency plan are evaluated. Only one is for cyanide.

Records of this training are kept for future reference.

The training matrix and records were reviewed to confirm training had scheduled and conducted.

The Health, Safety, Environment and Quality (HESQ) Manager explained that a structured process has been established for the training of new drivers. For the first six months, a new driver is partnered with an experienced driver to observe the appropriate level of driver quality and conduct expected.

The convoy carries all the necessary cyanide emergency equipment (cyanide releases and medical) with them and they are under armed customs escort..

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

X in full compliance with

The operation is in substantial compliance **with Transport Practice 1.3**
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

UMS only uses equipment designed and maintained to operate within the loads It will be handling when transporting cyanide.



**SUMMARY AUDIT REPORT
United Mining Supply
4-7 March 2018**

The TMP states that the axle loads for trucks and trailers used conform 10 ton the ECOWAS & UMOA treaty signed 1992 and 2006 respectively and the ERP includes the calculation for determining whether the truck and trailer is appropriate for the load:

Prior to every convoy, equipment is checked using the Cyanide Equipment Checklist product based checklist, these include inspections of the king pins and twist locks.

Transport management plan indicates UMS uses only equipment designed to operate within the loads.

Drivers are paired with set trailer (20 foot) and prime mover.

All the equipment used for cyanide transport have a preventative maintenance plan that is recorded.

The work conducted on the vehicles is based on the preventative maintenance schedule (hours and kilometers) and a discussion between the mechanic and the vehicle driver (reactive maintenance). Work orders are raised for all work conducted.

The weight of cyanide briquettes in a 20 foot container is 20 tons. Only one container is carried on each trailer.

The weight of the container is 2.3 tons and the weight of the trailer is 6 tons. The weight of the tractor is 8.3 tons.

Thus the Total weight of the truck, trailer and load is 40 tons, including fuel.

The truck & trailer is a 5 axel vehicle (3 axles on the tractor and 2 on the trailer),

thus the weight on each axle is based on 40 ton over 5 axel giving 8 tons per axle.

The Guinean and ECOWAS maximum axle weight is 11.5 tons, meaning that the loading of axles is well within the maximum legal limits.

Specific truck and trailer maintenance records were sampled and checked.

Transport management plan indicates cyanide container are loaded on trailers.

Cyanide is delivered in sealed containers as supplied by the manufacturer with same seals the containers are not opened at port and other form of delivery is done. No offloading or loading is done.

The container weights are detailed on the Bill of Lading prior to container collection from the Port of Autonome De Conakry.

The containers are sea worthy with BIVAC inspection approval all containers comply with the IMDG regulations.

No sub-contracting is undertaken due to the nature of the cargo.

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

X in full compliance with

The operation is in substantial compliance

with Transport Practice 1.4

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Journey plan has date of departure, where it is going, final destination, trip distance, loading and discharge order, truck number, remote number

If they have a comment for change of route, condition and emergency numbers as well.

TMP provides details black out areas are identified and managed, route are selected.

Also identifies rest point and rest points are audited as fit for purpose.

Due diligence on the port operation is done by ORICA.

Moreover, evaluation of roads, surveys, route risk assessment and also an update on the road changing conditions. routes used for cyanide deliveries.

Feedback on the route is received from drivers via journey plan.

The ERP and Transport Management Plan (TMP) require that routes are reassessed each month or more frequently if the season changes / requires.

During the convoy the Escort Commander provides real time risk management on the route condition.

**SUMMARY AUDIT REPORT
United Mining Supply
4-7 March 2018**

Feedback on the route is also documented in the End of Mission Report produced by the Escort Commander following each voyage and clearly stated and elaborated in the journey plan.

This is used as an awareness tool for convoy personnel and discussed during the pre-trip briefing of the next convoy.

The feedback / journey plan document take into consideration everything from road conditions, to population, to time of transit, where delay came from and possible solution to expedite the delivery.

The data from this sheet is transferred into an excel sheet and analysis is done to review and revise the level of risk on the road and if the risk or the number of hazards is increasing or reducing.

Convoy managers or escort takes this into account in their journey planning.

Route risk assessments are currently reviewed yearly.

All feedback is documented by Convoy Managers in the journey plan and transferred into the risk assessment during the yearly review.

Full routes are re-evaluated every five years although no alternative route is available

Road Survey and risk assessment is more of hazard identification and mitigation measures the identified hazard are, link to hazard map and updating the risk assessment. Population density, bridges, water bodies, black points, and black outs.

Also for the control quality department to ensure the route risk is evaluated.

The Road Survey procedure identifies steps to be taken in the assessment of transport routes and identifies personnel responsible for undertaking each step.

Utilisation des rest points also states the rest points area, the risk in these areas, how the rest point must be used. Which includes detailed route and rest stops and further identifies road hazards such as slippery roads, bridges, population densities, customs barriers, road construction, cyclists, traffic congestion, standard caution, heavy rain, cattle crossing, children, bridges etc.

Fonctionnement cellule OBC is to analyze the road risk. Includes a sample of the road hazard mapping from Conakry to Lero. .

Risk Assessment Conakry (Km536)-Mamou-Dinguiraye-Léro-usine SMD is route risk assessment from Conakry to Lero that considers the risks and the assessment of the risks as well.

Transport management plan ensures that the route has been analyzed in order to minimize the potential and impacts for accidents and releases.

Also ensures road risk assessment is used with infrastructure and condition is analyzed and controlled.

Each delivery is undertaken via convoy.

UMS have also developed a list of authorized rest & stop points that can be used along transport routes.

The road risk assessment highlights areas of significant population density and the control measures needed to address the potential for accidents and releases or the potential impacts of accidents and releases.

Feuille de route et PDV identifies the road condition and the hazards associated with it that was picked up during escort

UMS seek input from authorities, they have authorization letters from ministry of Health and public safety High Command of the National Police.

UMS seeks input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures.

The survey team meet to discuss issues or concerns with the client and drivers.

On completion, copies of the Survey Report are sent to the mine site and external responders for comment and advice.

Prior to any voyage departure,

the ERP contains a list of contacts including the client that positive communication must be checked with any additional issues with the proposed route can be addressed at this stage.

The community is consulted and involved limiting their role to crowd control and not to use any water during emergency until approved by the authority.

UMS sent letter to all communities that they pass through their territories seeking cooperation and explaining the dangers of cyanide emphasizing the core responsibility of the community is not to get close or involved during an incident and not to use any ground or surface water until it is declared safe to do so by the authority.



**SUMMARY AUDIT REPORT
United Mining Supply
4-7 March 2018**

Furthermore, the Minister of the Environment of Guinea are consulted on routes, especially considering the emergency response

UMS has advised external responders and medical facilities as necessary of their roles and/or mutual aid during an emergency response.

Prior to departure, contact is made with specified stakeholders detailed in the Emergency Response Plan (ERP). contact list has been updated periodically external responders are advised of their roles during an emergency response through letters and training coordinated by UMS.

Police undergo awareness before participating in convoys.

In the event of an emergency, they primarily provide protection functions which is not outside the scope of their normal roles.

External agencies including police, fireman, hospital etc.

also involved with incident scenario training simulations at least once per year.

UMS has sent letter to various community explaining the dangers of cyanide and the emergency response and the first aid needed and has sent letters to most of the communities' leaders and stakeholders that the convoy pass through.

The Ministry of Security granted permission for the transport of dangerous goods

The primary role of police is to provide protection in the event of an emergency.

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

X Not applicable

Summarize the basis for this Finding/Deficiencies Identified:

This section is not applicable as no modes of air or sea transport are used.

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

X in full compliance with

The operation is in substantial compliance **with Transport Practice 1.6**

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Transport management plan indicates vehicles are equipped with satellite tracking that monitored by UMS using Vehicle tracking system (Galooli).

The drivers do not use the communications equipment.

The driver assistant in each truck communicates with the convoy leader and support vehicles.

The convoy manager is obliged to call UMS every 60 minutes and to call the client every 2 hours.

Where no reception exists, the convoy commander calls before and after the reception black spot bearing in mind thuraya satellite phone is available for emergency.

VHF radio, headlights and horns are used to communicate incidents between vehicles in the same convoy.

Check list ensures that the OBC tracking is working properly.

**SUMMARY AUDIT REPORT
United Mining Supply
4-7 March 2018**

Transport management plan indicates that communication equipment shall be tested, reviewed and confirmed before convoy departure.

Communication equipment (GPS, mobile phone, radio,) is periodically tested to ensure it functions properly and is part of the check list.

Communication blackout areas are identified during the route assessment process and procedures are implemented to manage them.

Further, there is one thurya satellite phone on every convoy that is not affected by reception.

GPS tracking is implemented for all convoys.

Convoys periodically call by phone every 60 minutes UMS head office.

The container weights are also detailed on the Bill of Lading.

A scanner is used at the Port to verify that the correct container has been placed on the selected trailer.

UMS uses convoys as a means of managing the risks of road transportation, responding to emergencies and to prevent product loss.

The cyanide from the port of entry to destination is under the control and the responsibility of the authority due to the dangerous nature of the cargo.

The delivery documentation notes the container numbers, weights and seal numbers.

The ERP and TMP are also carried on the convoy along with an MSDS for cyanide and a list of emergency contacts between the port and site.

The declared weight of the container is appearing on the delivery note.

UMS manages the supply custody using the TMP.

The cyanide from the port of entry to destination is under the control and the responsibility of the authority due to the dangerous nature of the cargo..

2. INTERIM STORAGE: Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.

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

X in full compliance with

The operation is in substantial compliance **with Transport Practice 2.1**

not in compliance with

X Not applicable

Summarize the basis for this Finding/Deficiencies Identified:

In terms of Cyanide Code definitions, UMS does not have interim storage for its transportation certification.

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.

X in full compliance with

The operation is in substantial compliance **with Transport Practice 3.1**

not in compliance with



**SUMMARY AUDIT REPORT
United Mining Supply
4-7 March 2018**

Summarize the basis for this Finding/Deficiencies Identified:

UMS have an emergency response plan that manages cyanide accident from first aid, neutralization and external responders.

This plan gets updated yearly, or when the ER plan is activated, or in case of a drill feedback that needs to be amended.

No interim storage but the plan covers different scenarios and different routes specified by the Ministry in Guinea. UMS control convoy using the convoy formation and reduced speeds (max 50 km / h) used along the transport route. The plan addresses the responsibility of the roles for convoy personnel.

As all cyanide deliveries are made in convoy, the accompanying Emergency Response Team will implement the Emergency Response Plan.

If more support is needed in which case they will report to head office or external responders.

Further, UMS has dedicated 1 plane Beach craft and 2 helicopters for emergency evacuation of casualties or injuries

Physical and chemical forms of cyanide are described in the ERP and TMP. UMS only transport solid cyanide.

The ERP also details the steps to be taken to neutralize and clean up residual cyanide

The TMP and ERP consider the method of transport.

The documents were developed as an outcome of the route assessment process and consequently consider aspects of the transport infrastructure.

And the method of transport (Le . road).

The documents were developed on the outcomes of the route assessment process and consequently consider aspects of the transport infrastructure and the method of transport. The plan considers all aspects of road transport only since sea air and railway are not part of the scope.

The four emergency situations described in the ERP are based on prime mover and trailer configurations with 20 foot containers.

The ERP includes descriptions of response actions, as appropriate for the anticipated emergency situation.

Permit has been given from the authority to transport cyanide.

The mine site primarily provides logistical support in the event of an emergency (crane, security etc.) in case the incident is close to the mine.

The roles of the Police, Fire Brigade and Hospitals are in accordance with their duties.

External responders were advised of their roles during an emergency response through letters and training coordinated by UMS.

External agencies including police, fireman, hospital etc. are also involved with incident scenario training simulations at least once per year.

Community is informed and trained and consulted with all details not to get involved.

Any outside additional assistance would be requested or coordinated through the Ministry of Security

The possibility of using outside medical responders has been considered and a communication through letters and brochures

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

X in full compliance with

The operation is in substantial compliance

with Transport Practice 3.2

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

UMS has developed a training matrix for transport personnel.

**SUMMARY AUDIT REPORT
United Mining Supply
4-7 March 2018**

A training simulation for cyanide involving external responders is conducted at least once per year.
Transport management plan states the involvement and training of stake holders in case of emergency.
Critical task and critical position procedure indicates the training and competency needs for all jobs and includes emergency response.
Convoy team members are trained in emergency response.
A flow diagram is included in the ERP that outlines the flow of information in the event of a cyanide incident during transport.
The ERP also outlines key commitments of the cyanide manufacturer.
ERP describes the emergency response duties and the personnel involved.
UMS has a checklist for emergency equipment that that is available during transport or along the transportation route.
The procedure also states the equipment needed and available per convoy.
The equipment is checked per trip and monthly to verify the expired ones also test are done per inspection.
UMS has a checklist for necessary emergency response and health and safety equipment including PPE that is checked before each convoy.
The convoy escort vehicles carries all the necessary emergency response equipment that may be required for cyanide emergencies during the convoy.
UMS provides transport vehicle operators with initial and periodic refresher training in emergency response procedures.
UMS has developed a training matrix for all transport personnel.
This matrix identifies the training needs for escort personnel and convoy drivers.
Training is provided by UMS annually or more frequently if needed.
A training simulation Drill for cyanide involving external responders is conducted at least once per year.
Discussions with convoy personnel confirmed that they knew what their roles were in an incident.
Transport management plan indicates that the drivers must have received prior induction (refreshment) in order to know how to deal with emergencies.
All members of the convoy team (escort vehicle and drivers and safety officers) are trained in the Emergency Response Plan
Pre-trip briefing includes refresher of emergency procedures.
The convoy cannot leave unless all equipment is available and in appropriate condition.
Convoy equipment is checked and tested before the convoy moves.
Equipment that requires calibration are sent to the manufacturer.

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

X in full compliance with

The operation is in substantial compliance **with Transport Practice 3.3**
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

ERP indicates the contacts that are relevant during an emergency with their appropriate work position.
The ERP and associated documents contain procedures and current contact information for notifying the shipper, the receiver/consignee, outside response providers, and medical facilities of an emergency.
A flow diagram is included in the ERP that outlines the conveying of information in the event of a cyanide incident during transport.

UMS has systems in place to ensure that internal and external emergency notification and reporting procedures are kept current.
The ERP requires a review of the contacts list prior to the convoy departure.



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

X in full compliance with

The operation is in substantial compliance **with Transport Practice 3.4**
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

UMS has procedure for remediation, such as recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris.

Residual cyanide will be recovered and neutralized according to the procedures for neutralization which were established by the manufacturer.

Treatment and or disposal of soils; reclamation of Sodium Cyanide; Transport of contaminated materials; Neutralization; and Water Resource Treatment.

Both the ERP and TMP have statements prohibiting the use of chemicals such as sodium hypochlorite, ferrous sulfate or hydrogen peroxide for the treatment of cyanide discharged to surface moving water.

The ERP details the negative implications of using sodium hypochlorite, ferrous sulfate or hydrogen peroxide for the treatment of cyanide discharged to surface moving water.

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

X in full compliance with

The operation is in substantial compliance **with Transport Practice 3.5**
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The system reviews all procedures include ER plan every year and the management reviews were all recorded. Incidents are reviewed especially the emergency situation and strategic decision that are made.

The internal audit evaluate the effectiveness of the system.

The ERP requires a review of the contacts list prior to the convoy departure.

This ensures that the list is kept up to date.

Emergency simulations are carried out twice per year where specific aspects of the emergency plan are evaluated.

A training simulation involving external responders is conducted at least once per year.

The drill done by UMS is in order to have the escort team to react effectively and professionally in the case of a cyanide incident in workshop.

In addition the ERP contains a requirement that it is to be reviewed and Implemented.

No cyanide incidents have been reported to date.

The ERP requires a review of the contacts list prior to the convoy departure.

The ERP has had one revision since its development.