

SUMMARY AUDIT REPORT



**ICMI Cyanide Code Principle 2
Transportes ZETRAMSA, S.A.C.
Cyanide Transportation Certification Audit
Santa Anita, Lima - Perú**

**Submitted to:
International Cyanide Management Institute (ICMI)
1400 I Street, NW – Suite 550
Washington, DC 20005, USA**



Geosoluciones Panamá, S.A.
P.O. Box 0923-00340
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Transportes ZETRAMSA, S.A.C.
Name of Facility

Initial Audit

Signature of Lead Auditor



ISOSURE, S.A.C.
Av. Los Paracas 429 Salamanca
Lima, Peru

September 25, 2013
Date

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A- GENERAL SUMMARY

A.1 Information of the Audited Operation

Name of Cyanide Transportation Facility: Transportes Zetramsa, S.A.C.

Name of Facility Owner: Zetramsa

Name of Facility Operator: Transportes Zetramsa, S.A.C.

Name of Responsible Manager: Víctor Ticlavilca Correa

Address: Ave Cascanueces Mz L Lt 6 State/Province: Country: Santa Anita /Lima / Perú

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(CERTIFICATION AUDIT)

Location detail and description of operation:

Transportes ZETRAMSA, S.A.C., (ZETRAMSA) facilities are located in Santa Anita, District of Lima, Republic of Peru and was formed with the aim of providing general freight service. Over the years, the company focused its activities in "specialized load," including explosives.

It covers transportation of explosives, delicate loads, all kinds of machinery, and cargo that exceeds normal weights and measures transported.

Currently, ZETRAMSA specializes in complete projects, from start to finish, and in meeting all requirements set by the client. It provides heavy duty low-bed and oversized packages service, carrying from 15 to 100 tons per unit.

ZETRAMSA has a variety of platforms that conform to any path of Peru; this allows us a continuous movement nationwide. We use units specially designed for the transport of explosives and cyanide in order to enter the country's major mining centers.

We considered freight service with escort service nationwide for convoys or for route surveys. All our units have GPS service, in this way, we can provide regular reports to customers at no additional cost for them.

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A.2 Overall Auditor's Finding

This operation is in full compliance with the International Cyanide Management Code.

Audit Company: Geosoluciones Panamá, S.A.



Audit Team Leader: Jorge Efrén Chong Pérez Email: geosoluciones@cwpanama.net


Names and Signatures of Other Auditors: Carlo Brando Bolivar Vargas

Date(s) of Audit: September 25, 2013

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanided 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 describe 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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B- ROLE AS CYANIDE TRANSPORTATION

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

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

This operation is

- In full compliance
- In substantial compliance Transport Practice 1.1
- Not in compliance


Summarize the basis for this Finding/Deficiencies Identified:

ZETRAMSA conducted eight (8) routes evaluation based on the procedure P-TRA-004, related to the transport of materials and / or hazardous waste. This was approved by the Ministry of Transport and Communications (MTC, for its Spanish acronym), under 106-2009-MTC/16 Directorial Resolution, which is valid until September 22, 2014. The items described for evaluation during the path analysis are checked so that they are consistent with the International Code for the Cyanide Management.

The Health and Safety Manager records the route to assess on the form "List of Route Risk Assessment", aspects related to:

- Hours of driving and rest
- Breakpoints usage
- Unsafe conditions (road conditions, weather conditions, and traffic)
- Handling speed piecewise
- Markings and prohibitions of the road
- Heights of bridges, tunnels, hills projections, track width, etc.
- Bodies of water
- Population density.
- Foggy areas
- Other aspects of transport safety.

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It should take into account the assessment information, as identified in the Hazard Identification Risk Assessment Matrix (with regard to driving hours) and the provisions of Article 30 of the DS 017-2009-MTC-related to driving hours.

Procedure P-TRA-004, establishes the criteria for Development of Route Sheet, which is the responsibility of the Health and Safety Manager, Operations Manager, and Supervisor Drivers Escort.

For initial evaluation route the search should be performed on the company truck plotting of the company, which must be equipped with the tools detailed in form F-LOG-007.

The Route Sheet is analyzed based on instructions to Hazard Identification, Risk Assessment, and Determining Controls. ZETRAMSA also performs assessment of environmental risks which are identifying Aspects, Impacts, and Environmental Risks.

In every transportation Risk Evaluation and Dangerous Identification (IPER for Spanish acronym) a form is filled out. Route and IPER records were revised.

Whenever a route is evaluated, elements of risk control are inserted in the table below. The Table describes an example of routes documentation.


Letters sent to firefighters and medical centers were reviewed to communicate their roles in case of any emergency and to open communication channels between Zetramsa centers and emergency support.

Also trip reports and recommendations are provided by convoy supervisor in the Trip Report or "Informe de Ruta" issued for each trip.

As the procedure P-TRA-003, for the transport of hazardous materials (including sodium cyanide), ZETRAMSA has a control room based in Santa Anita. The GPS system provides continuously the positioning of each of the vehicles at all times, as well as continuous monitoring of the speed at every point of the route from the starting point to the end point. This information is then printed and delivered to the head of the Safety Department.

Additionally, it has a SISGPS system: It is set in order to display in real time (updated time) and graphically vehicular tracking using GPS technology, integrated system.

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The system has two main functions: they can load one or more maps where fleet units are running, and the second function allows us to generate reports in graphical form or in the screen to recreate the path of the vehicle as necessary, in order to determine where to stop, exact time of the stop, and for how long was the drive in that place.

The truck can only upload one (01) container for each platform and can only drag a wagon chassis. The convoy may include one or more escort vehicles at the request of the customer. Convoy displacement will be dependent on weather conditions, the convoy leader evaluates the safety of the route in each case, and convoy may stop if conditions do not allow for safe travel.

ZETRAMSA has provided information (MSDS, emergency and product information) to support emergency centers (emergency responders, medical centers, and Fire Companies) along the routes, and they have to sign an acknowledge receipt of the letter of such information. This activity is carried out so that they are prepared for an emergency.

ZETRAMSA does not subcontract other companies to transport Sodium Cyanide.

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.


This operation is

- In full compliance
- In substantial compliance Transport Practice 1.2
- Not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

ZETRAMSA maintains training schedule, samples where employee files comprise records of hazardous materials training; defensive driving were verified, including medical records and follow-up exams. It establishes minimum requirements for the drivers: good health condition, legal affairs, defensive driving, and emergency response training in handling sodium cyanide.

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As part of the initial induction and training scheduled, drivers must rest once a week and drive up to eight (08) hours a day, with breaks of two (02) hours. Drivers should sleep at least eight (08) hours before each trip, and they should not drive for more than twelve (12) hours per day. This is also regulated by the Peruvian government through the legal device of Supreme Decree 009-2004-MTC.

ZETRAMSA does not subcontract other companies to transport Sodium Cyanide.

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

This operation is

- In full compliance
- In substantial compliance Transport Practice 1.3
- Not in compliance

Summarize the basis for this Finding/Deficiencies Identified:


According to the vehicle Single Circulation Card (TUC, for its Spanish acronym) from the Ministry of Transport and Communications, all vehicles used for cyanide transportation met with standard S3 T3 (seven axis) specification, with 5% additional capacity supported by special specifications of the Volvo brand.

The P-MAN-001 procedure applies for visual inspection, preventive and corrective vehicles maintenance. Inspection records, programmed repair, and work orders were verified. ZETRAMSA has recently added new Volvo units for the transport of cyanide: for a total of Volvo (39) units and (9) Scania. All trailers are 2009, 2010, 2011, and 2012.

Prior to loading and use, trucks are inspected by ZETRAMSA personnel to ensure there are no deviations that could affect the operation. Inspection is logged in the P-TRA-001 form.

After the load is fixed, ZETRAMSA makes a record of the weights and measures to record the weight of the load and verify that it does not exceed the maximum established under Peruvian law by type of vehicle configuration and based in the government's vehicle circulation card.

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In addition, in all the routes used there are weight and size controls from the Ministry of Transport and Communications, which gives significant penalties in case of violations that can reach up to the confiscation of the cargo.

Before the trip carrier must have and complete the following documents:

Referral Guide Sender

Transporter Referral Guide

Tract Property Cards and Semi-Trailer

Vehicle Property Cards and Semi-Trailer

Vehicle Registration Card in the National Register of Hazardous Materials and Waste Transportation, issued by the Ministry of Transport and Communications (MTC).

The above-mentioned documents are part of the check-out list. They are comparative elements to prevent the vehicle from being overloaded.

ZETRAMSA does not subcontract other companies to transport Sodium Cyanide.

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


This operation is

- In full compliance
- In substantial compliance Transport Practice 1.4
- Not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

ZETRAMSA established a method of preventing load instability during vehicle movements, as described in P-TRA-004, Machine and Equipment Rigging “Trincado de Maquinaria y Equipos de Camabaja”.

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A route sheet and administrative, operational, and safety measures were prepared for the proper development of the described transport operation of sodium cyanide. This includes maintaining a proper speed especially on unpaved terrain.

For hazardous materials transportation (including sodium cyanide), Zetramsa has a control room based in Santa Anita. The system continuously provides GPS positioning for each one of the vehicles at all times.

Before the trip, in the three visible sides of the containers are placed UN number, Department of Transportation (DOT), and National Fire Protection Agency (NFPA) diamond code number labels. Peruvian law complied with Supreme Decree 021-2008-MTC Regulation for the transport of hazardous materials / waste.

ZETRAMSA safety program includes pre-trip inspection and documentation for each vehicle, and implements P-TRA-003, monitoring units where the need for trip conformity exists.

ZETRAMSA has a maintenance plan. Maintenance records were reviewed and the practice was confirmed during vehicle observation and interviews with the maintenance supervisor and drivers.

Drivers must rest at least 8 hours prior to operation and they should not drive for more than 12 hours a day, as part of Peruvian rules that provide the same hours for the transport of hazardous materials "DS 009-2004-MTC Regulation of Transport Management Act"


Cyanide transport is only allowed in day time.

The trip will take place in the way of convoy; the convoy leader is responsible for the assessment of weather conditions and is empowered to suspend the transport convoy.

The consumption of alcohol, drugs, or any medication that may affect the driver's performance or convoy members is prohibited.

Before each trip, the employee must undergo alcohol testing and periodically discard evidence of drug use. Violation of this policy has resulted in the separation of the worker from the organization.

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ZETRAMSA does not subcontract other companies to transport Sodium Cyanide.

Transport Practice 1.5: Follow international standards for transportation of cyanide by sea and air.

This operation is

- In full compliance
- In substantial compliance Transport Practice 1.5
- Not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

Transportes ZETRAMSA, S.A.C. does not transport by sea or air.

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

This operation is

- In full compliance
- In substantial compliance Transport Practice 1.6
- Not in compliance


Summarize the basis for this Finding/Deficiencies Identified:

Persons in charge of monitoring when interviewed explained that Zetramsa uses a GPS system. They also have telephone service, radio, and cellular pathway that ensure total coverage at all times. They are completely connected to the control room in Santa Anita.

Normally, ZETRAMSA uses a GPS system and, in case of blackout areas, monitors a control center with satellite phone, which has a supervisor in charge.

To prevent loss of cyanide during shipment ZETRAMSA has a GPS system location updates in real time. In areas without GPS coverage, ZETRAMSA saves the information transmitted.

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The bill of lading and carrier waybill (“Guía de Remisión del Remitente y Guía de Remisión del Transportista”) are part of the shipping records of the amount transported.

The sender’s reference guide indicates the product name, number of the United Nations (UN), and the number of packages transported cargo weight, and likewise the product’s safety considerations are indicated.

With the sender reference guide from the vendor, delivers the Material Safety Data Sheet to the carrier.

The lack of sender reference guide and Material Safety Data Sheet during transport is fined with the confiscation of the cargo by the Peruvian government, since those documents are mandatory.

The sender’s reference guide should be preserved and stored by the carrier for not less than five (5) years.

Peruvian regulations require that the quantity of cyanide is indicated, as well as existing MSD Sheets should be maintained (in Peru are valid for five years).

ZETRAMSA does not subcontract other companies to transport Sodium Cyanide.

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.

This operation is: THIS PRACTICE DOES NOT APPLY TO THIS OPERATION.

- In full compliance
- In substantial compliance Transport Practice 2.1
- Not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

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Transportes ZETRAMSA, S.A.C. transportation operations do not involved the use of interim storage facilities.

3. EMERGENCY RESPONSE: Protect communities and the environmental through the development of emergency response strategies and capabilities.

Transport Practice 3.1: Prepared detailed emergency response plans for potential cyanide releases.

This operation is

- In full compliance
- In substantial compliance Transport Practice 3.1
- Not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

Transportes ZETRAMSA, S.A.C., implemented the Contingency Plan for eight (8) transport routes related to Hazardous Materials and / or Waste on September 22, 2009. It was approved by the Ministry of Transport and Communications (MTC) through Board Resolution 106-2009 - MTC/16.


Information of road conditions is defined in the route sheet document. The Emergency Plan describes the response actions for emergencies previews. These were verified during the audit.

The Emergency Response Plan is adequate for the selected transport routes based on hazard and risk assessment after the implementation of the route map, and the actions that are derived from each incident that may occur are based on the risk analysis of that route.

The Emergency Response Plan takes into account the chemical cyanide properties based on the Material Safety Data Sheet for "Sodium Cyanide."

ZETRAMSA considers the use of trucks to transport sodium cyanide considering the characteristics of this equipment and road conditions. Whenever transport of sodium cyanide is performed, an evaluation is conducted.

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Information on road conditions is defined in the route sheet document. The Emergency Plan describes response actions for emergencies previews. These were verified during the audit.

The emergency response plan, also establishes the logical line of actions that the leader and convoy drivers must take when irregularities arise during transport of sodium cyanide, including civil commotion, adverse conditions, bad weather, traffic congestion, and unplanned stops.

ZETRAMSA used trucks also all lowboy trailers were purchased with a load capacity which are certified for transport of sodium cyanide by the Peruvian government.

ZETRAMSA has a set of actions in case route incidents occur. These actions are described below.

- Incident without injuries
- Mechanical problems
- Rollovers with spill
- Overturning without spill
- Fire truck
- Crash with injuries / No injured
- Water Spill, cleaning and decontamination
- Social conflicts
- Adverse weather conditions
- Congestion

ZETRAMSA establishes three levels of emergency response:


Level I (Incident)

- Minor emergency that can be controlled by Zetramsa drivers.
- Controlled by own resources.
- Any incident in route (mechanical failure, collisions with animals, etc.).

Level II (Emergency)

- Emergencies that affect the driver, the transport unit and merchandise.
- Controlled by the company's own resources, the sender and the recipient.
- Involves the intervention of support agencies (Peruvian National Police, fire stations, health) and local authorities.

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Level III (Crisis)

- Emergencies that must require external support for Transport Zetramsa, from sender and the transporter.

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

This operation is

- In full compliance
- In substantial compliance Transport Practice 3.2
- Not in compliance

Summarize the basis for this Finding/Deficiencies Identified:


During the audit, ZETRAMSA showed that drivers and supervisors are trained in appropriate emergency response in safe cyanide management (spill and intoxication), defensive driving, firefighting, first aid, hazardous materials Level I and Level 2. These workouts are renewed annually complying with the training plan and verifying compliance with specific skills. Training is provided by external companies.

Drivers with supervisors are responsible to respond in an emergency. They both need to pass a medical evaluation in order to perform these activities and have received the necessary training for efficient emergency response conditions.

Each truck has the required emergency response teams. Also, the convoy supervisor has a Response Kit, spills and poisoning (antidote kit), and personal protective equipment to be verified before the trip. This verification needs to be made before starting the trip.

The Emergency Plan section 9., indicate that ZETRAMSA has the necessary equipment for emergency response in case of an increased activation of the second response. ZETRAMSA contracted IFSEC PERU, which is comprised of Peru's Fire Department Hazardous Materials personnel trained.

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Records of emergency response equipment and inspection were checked. The Emergency Plan indicates staff functions in an emergency, also the emergency equipment to be used in both the first and second response. The Emergency Plan describes specific emergency response roles and responsibilities of the staff.

Form F-TRA-003 V.0 OPERATIONS REPORT TRANSP. ZETRAMSA indicates the verification criteria prior to each trip, for which the use of the forms SSO-003 F-Job Safety Analysis (AST) is required.

ZETRAMSA does not subcontract other companies to transport Sodium Cyanide.

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

This operation is

- In full compliance In full compliance
- In substantial compliance Transport Practice 3.3
- Not in compliance

Summarize the basis for this Finding/Deficiencies Identified:


The Emergency Plan indicates the current contact list which is reviewed and updated through periodic checks. This is done by placing some calls to numbers listed on the contact list.

ZETRAMSA Emergency Plan establishes procedures and formats regarding security, incident, and waste disposal resulting from these.

- The format of the information assessing the magnitude of the emergency occurred in an accident or incident during the transport of materials and / or hazardous waste by road or rail:

- Reporting and Investigating Incidents / Accidents:

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- Procedure for cleaning and decontaminating major cyanide accident
- Procedure for disposal of Sodium Cyanide
- Security Primer for spills of solid sodium cyanide
- Emergency Organization

Operations Manager

Before the Emergency

- Provides emergency equipment.
- Maintains control of the units in route
- Ensures preventive controls established are met

During the emergency

- Settling in the command post.
- Provides information to Customer.
- Coordinates with the Head of Logistics and Maintenance materials and equipment as required.
- Distributes and assigns tasks teams.
- Reviews the equipment and materials received on the scene.

- Leads the teams.
- Coordinate the delivery of resources
- Ensures the safety of he/her staff.

After the emergency

- Reports in writing to the Occupational Health and Safety Manager resources used and all information required for the final report.

Similarly, the emergency described responsibilities for each link in the flow of communication and the actions that must execute each responder, such as occupational safety manager, logistics manager, drivers, and supervisors' convoy.

The Emergency Plan, includes internal periodic verification that the contact information is current. Call flow by the safety personnel responsible for emergency, regulatory agencies, outside response providers, medical centers, fire departments, and communities that may be affected by an emergency are specified.

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

This operation is

- ✓ In full compliance
- In substantial compliance Transport Practice 3.4
- Not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

The Emergency Plan describes how the recovery will take or neutralize the solid, the decontamination of soils, or other contaminated media and how these wastes are managed.

Steps to follow in case of spill:

Immediately, move personnel without safety protection and maintain them in fresh air.

- Personal safety equipment

Employees must wear personal safety equipment (overall with hat, boots, gloves, and respiratory protection).

- Preventive measures to avoid

Collect all visible dry materials seal the bag. Put the bag in empty drums and label them properly. Avoid chemical liquids to run down the drainage, in case of a misfortune, notify the area emergency service.

- Cleaning methods: Collect all visible materials.


- Method to treat waste:

Apply sodium hypochlorite dilution, calcium hypochlorite, or ferrous sulfate, according to MSDS, local and international standards, and practices.

Avoid the contact of detoxification corrosive chemicals.

After one (1) hour of the incident, wash the contaminated area with water to guarantee the dilution.

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ZETRAMSA Emergency Plan, 2013 prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water.

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

This operation is

- In full compliance
- In substantial compliance Transport Practice 3.5
- Not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

The period of review and evaluation of the emergency plan is at least once a year.


The ZETRAMSA Management is responsible for requesting immediate changes to this Plan, in the event serious incidents occur, for results of simulations, results of audits, or inspections by process improvement, among others.

Changes and updates are performed by the Quality Department, following from Document Control and Records procedure.

The Emergency Plan and training defines the frequency of emergency drills; both documents present scheduled emergency drills.

Drills are carried out by the head of Safety and, in a semester basis, indicating the completion of one (1) theoretical drill and practical (1) drill, in order to evaluate the effectiveness of the Emergency Plan and correct and insert improvements obtained with lessons learned.

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The procedure for measuring the efficiency of emergency response established:

The Chief Security takes into account the rapid preliminary compilation of the situation, gathering the basic facts as known at the time: the who, what, where, when, how and why of the situation. He contacts the person responsible and retransmits information obtained. He continuously communicates with the Convoy Leader and will handle the requirement of authorities.

A simulation exercise was held on June 4, 2013, in a scenario with Collision Fuel Spill and Person Wounded in the 185 Km road Conococha – Huaraz.

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