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## **SUMMARY AUDIT REPORT**

**AUSTRALIAN GOLD REAGENTS PTY LTD  
OCEAN FREIGHT SUPPLY CHAIN**

**ICMI CYANIDE TRANSPORTATION  
VERIFICATION PROTOCOL  
RECERTIFICATION AUDIT  
APRIL 2023**

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## APPROVAL & CHANGE HISTORY

Approval and Change History					
Rev	Description	Approval			
		Date	By		
			MSA	MSA	AGR
A	Issued for AGR Concurrence	24 April 2023	MS	SAZ	DG
0	Issued for Information	27 June 2023	MS	SAZ	DG

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## 1. INTRODUCTION

### 1.1. Operator Details

Name of Transport Operation:	Ocean Freight Supply Chain
Name of Facility Owner:	Australian Gold Reagents Pty. Ltd.
Name of Facility Operator:	CSBP Limited
Name of Responsible Manager:	Darren Gould, Product Support and Logistics Specialist - Australian Gold Reagents Pty Ltd
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Audit Protocol Employed:	International Cyanide Management Institute, Cyanide Transportation Verification Protocol, June 2021 <a href="http://www.cyanidecode.org">www.cyanidecode.org</a>

### 1.2. Description of Operation

#### 1.2.1. Australian Gold Reagents Pty Ltd

Australian Gold Reagents Pty. Ltd. (AGR) is the management company of the unincorporated joint venture between CSBP Limited (CSBP) and Coogee Chemicals Pty Ltd. CSBP is part of the Wesfarmers Chemicals, Energy and Fertilisers Division of Wesfarmers Limited. CSBP is the major participant in the venture and acts as both operator and sales agent of the entire business. Coogee Chemicals Pty Ltd is a local manufacturer and distributor of industrial chemicals. As the operating agent, CSBP employees act on behalf of AGR.

The AGR cyanide production facility is located within CSBP's fertiliser and chemicals complex at Kwinana, approximately 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% solution and solid sodium cyanide as a >97% white briquette.

AGR's Kwinana production facility was recertified in full compliance with the Production Verification Protocol in September 2020.

AGR's **Australian Supply Chain**, (formerly referred to as the Western Australian Supply Chain) covers transport from the Kwinana Production Facility, using road and rail transport to end users mine sites in Western Australia and rail transport to South Australia and Victoria, as well as road transport to Fremantle port for export supply.

AGR's Australian Supply Chain was recertified as being in full compliance with the Cyanide Transportation Verification Protocol in November 2022.

The West Australian Supply Chain is outside of the scope of this audit.

AGR's **Marine Transportation** constitutes the Ocean Freight Supply Chain and it is a consolidation of all marine carriers used or proposed to be used by AGR to distribute their solid sodium cyanide from Fremantle Port in Western Australia to their global customers. The supply chain forms the marine link between the certified West Australian Supply Chain and the certified supply chain or certified transporter relevant to the customer site.

AGR's Ocean Freight Supply Chain comprises the following **Marine Carriers**:

- a) Regularly used:
  - MSC (Mediterranean Shipping Company)
  - Maersk
  - ONE (Ocean Network Express)
- b) Carriers not used since the last recertification audit and do not form part of this recertification audit:
  - Hapag-Lloyd
  - Hamburg-Sud
  - Swire Shipping
- c) Carrier not used since last recertification audit but proposed to be used and included in this recertification audit:
  - CMA-CGM

Main routes used by the carriers are briefly summarised below:

**MSC:** The main routes covered by MSC is from Europe via the Mediterranean, Sub-Continent, SE Asia and on to the west coast of the USA. AGR exports are shipped from the Port of Fremantle to the SE Asia Hub, then transhipped in a main line carrier to a Mediterranean or European Hub and again transhipped on to a feeder vessel servicing African Ports, South and Central American Ports, Asia and European Ports.

**Maersk:** AGR utilises Maersk Shipping to move product from Fremantle port in Western Australia to customers in South America. The main route is from Europe via the Mediterranean, Subcontinent, SE Asia, China and on to the West Coast of the USA.

Feeder vessels servicing other destinations will link services through these hubs. AGR exports are shipped from Fremantle port to the SE Asian Hub, then transhipped to a Mediterranean or European Hub and again transhipped on to a feeder vessel servicing South American ports.

**ONE:** AGR uses ONE to move product from the port of Fremantle in Western Australia to customers around the world including South Africa, and Indonesia.

**CMA-CGM:** CMA-CGM (ANL) specialises in moving product to and from Oceania and beyond. ANL offers shipping services to all major Oceania destinations, with coverage throughout Asia, Australia, New Zealand, the Pacific Islands, Indian Subcontinent and North America.

AGR are not currently using ANL but wish to have the option to do so.

The selection of a particular carrier depends on pricing, routes, logistics and performance. As with all services providers, AGR continues to review and monitor their performance.

### 1.2.2. MSC

Mediterranean Shipping Company, (MSC) was founded in 1970 and is headquartered in Geneva, Switzerland, and since 1978 is a privately owned organization driven by the Aponte family.

MSC operates a fleet of 730 vessels with more than 150,000 staff. MSC calls into 520 ports and 260+ trade routes covering 155 countries carrying over 23 million TEU annually. Through a network of 675 offices, MSC ensures shippers can talk directly to AGR representatives as well as using a variety of e-business solutions for digitalised cargo bookings.

MSC has provided container shipping services to AGR since AGR commenced export of solid sodium cyanide in 2002.

MSC Shipping is accredited to the following:

- ISO 14001:2015 – Environmental Management
- ISO 50001:2018 – Energy Management Systems
- ISO 45001:2018 – Occupational Health and Safety (MSC Shipmanagement)
- ISO 28000:2007 – Security Management System (MSC Shipmanagement)
- ISO 22301:2019 – IT Business Continuity (MSC Technology)

- ISO 27001:2013 – Information Security Management System (MSC Technology)
- ISO 9001:2015 – Quality Management System
- ISO 26000:2010 – Guidance on Social Responsibility.

AGR utilises MSC to move solid sodium cyanide from Fremantle Port in Western Australia to customers in East and West Africa, South and Central America, Asia and Europe.

The main route is from Europe via the Mediterranean, Sub-Continent, SE Asia, China and the West Coast of USA. Feeder vessels servicing other destinations will link through these hubs.

AGR exports are shipped from Fremantle Port to a SE Asian Hub, then transhipped on to a main line carrier to a Mediterranean or European Hub and again transhipped on to a feeder vessel servicing customers in West and East Africa, South and Central America, Asia and Europe.

### 1.2.3. Maersk

AP Moller-Maersk was established in April 1904 in Svendborg on the Danish Island of Funen. Maersk Shipping office is situated in Copenhagen, Denmark.

In the period 1913- 1940, it consolidated as a leading company in Denmark with activities in brokerage, shipbuilding, liner shipping and tanker trade. Although the second world war reduced the fleet to 21 ships, the Maersk fleet was back to pre-war tonnage within three years and expanded to where it is today.

Its activities as a wide-ranging conglomerate span more than 130 countries and 65 terminals, 110,000+ employees and 700+ container vessels.

Maersk Shipping is accredited to the following:

- ISO 14001:2015 – Environmental Management
- ISO 50001:2018 – Energy Management Systems
- ISO 45001:2018 – Occupational Health and Safety (Maersk Shipmanagement)
- ISO 28000:2007 – Security Management System (Maersk Shipmanagement)
- ISO 22301:2019 – IT Business Continuity (Maersk Technology)
- ISO 27001:2013 – Information Security Management System (Maersk Technology)
- ISO 9001:2015 – Quality Management System
- ISO 26000:2010 – Guidance on Social Responsibility.

AGR utilises Maersk Shipping to move solid sodium cyanide from Fremantle Port in Western Australia to customers in South America. The main route is from Europe via the Mediterranean, Sub-Continent, SE Asia, China and the West Coast of USA. Feeder vessels servicing other destinations will link through these hubs.

AGR exports are shipped from Fremantle Port in Western Australia to the SE Asian Hub then transhipped on a main line carrier to a Mediterranean or European Hub and again transhipped on to a feeder vessel servicing the South American ports.

### 1.2.4. ONE

Ocean Network Express Ltd. (ONE) was established in July 2017 following the liner service integrations of Kawasaki Kisen Kaisha ("K" line), Mitsui O.S.K. Lines (MOL) and Nippon Yusen Kaisha (NYK). The entity functions from its global headquarters in Singapore and is supported by regional headquarters in Hong Kong, United Kingdom, the USA and Brazil.

As of the end of 2021, its fleet size stood at 1,505,000 TEU making it the 7<sup>th</sup> largest carrier in the world. Operations are performed through a fleet of 211 vessels with a service network covering 350+ ports in 109 countries. The ONE fleet includes 46 super large ships (20,000TEU and 14,000 TEU).

ONE is accredited and affiliated to the following:

- ISO 14001:2015 – Environmental Management
- ISO 9001:2015 – Quality Management System
- World Shipping Council
- Global Maritime Forum – decarbonisation of shipping.

- Singapore Shipping Association.

AGR utilises ONE to move solid sodium cyanide from Fremantle Port in Western Australia to customers in Asia and the West Coast of Africa.

AGR exports are shipped from Fremantle Port in Western Australia to the Singapore Hub and then transhipped on to vessels servicing ports in Asia and East Africa.

### 1.2.5. CMA-CMG

CMA-CMG is a French container transport and shipping company. It is the world 3rd largest container shipping company. ANL is a subsidiary of CMA-CMG in Oceania. ANL was originally established by the Australian Government in 1956 and later became part of the CMA CGM Group based in Marseille, France in 1998.

ANL specialises in moving product to and from Oceania and beyond, offering shipping services to Asia, Australia, New Zealand, Pacific Islands, Indian Sub-Continent and North America.

Beyond Oceania, ANL remains an important member of the CMA CGM Group which has more than 200 shipping routes, 530 vessels calling to over 420 ports in 160 countries. It employs 110, 000 staff in over 755 agencies and offices around the world.

CMA-CMG is accredited to the following:

- ISO 14001:2015 – Environmental Management
- ISO 50001:2018 – Energy Management Systems
- ISO 45001:2018 – Occupational Health and Safety (CMA-CMG Shipmanagement)
- ISO 28000:2007 – Security Management System (CMA-CMG Shipmanagement)
- ISO 22301:2019 – IT Business Continuity (CMA-CMG Technology)
- ISO 27001:2013 – Information Security Management System (CMA-CMG Technology)
- ISO 9001:2015 – Quality Management System
- ISO 26000:2010 – Guidance on Social Responsibility.

AGR has not utilised CMA-CMG during the last recertification period. It has included CMA-CMG to be able to utilise this shipping company if and when required.

### 1.2.6. Transit Storage

Depending on weather, cargo types, journey length and other operational matters, carriers may trans-ship their cargo from one vessel to another. This involves unloading the cargo at a terminal facility, temporary set down and loading onto another vessel for the continuation of the delivery. Such trans-shipment does occur within AGR's Supply Chain. AGR has no control over when and where this happens, but through its due diligence assessments has satisfied itself that the carriers used undertake the shipping of the product in accordance with the IMO DG Code and in a professional and safe manner.

### 1.2.7. Exposure and Environmental Incidents

Since the last recertification audit there have been no reported incidents of cyanide exposure or transport accidents involving AGR's Ocean Freight Supply Chain.

## 2. AUDIT TEAM FINDINGS AND ATTESTATION

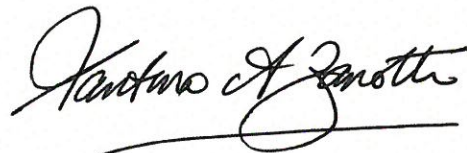
### AGR Ocean Freight Supply Chain is

- in full compliance with the International Cyanide Management Code  
 in substantial compliance  
 not in compliance

This Operation has not experienced any compliance issues during the previous three-year audit cycle.

It is also confirmed that this Operation has not experienced any significant cyanide incidents during the preceding audit cycle.

Audit Company:	MSA Consulting WA
Date(s) of the Audit	10 <sup>th</sup> to 21 <sup>st</sup> April 2023
Audit Team Leader:	Michael Sputore
E-mail:	msa@iinet.net.au
Names and Signatures of Other Auditors:	Santino Zanotti



27 June 2023

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Certification 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 Certification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the certification audit. I further attest that the certification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Transportation and using standard and accepted practices for health, safety and environmental audits.

Signature of Lead Auditor:	Michael Sputore
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27 June 2023



### 3. AUDIT FINDINGS

#### AGRs Ocean Freight Supply Chain is:

- in full compliance with the International Cyanide Management Code  
 in substantial compliance with  
 not in compliance with

This finding is relevant to AGR's activities in ensuring compliance of its Ocean Freight Supply Chain with the Code transport standards of practices, and its activities in the transport of solid sodium cyanide by sea to customers worldwide.

#### 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.*

#### AGRs Ocean Freight Supply Chain is:

- in full compliance with Transport Practice 1.1  
 in substantial compliance with  
 not in compliance with

#### *Basis for this Finding:*

AGR utilises, Mediterranean Shipping Company (MSC), Maersk and Ocean Network Express (ONE) for interstate and international shipping of solid cyanide. CMA-CMG is not currently used as a carrier but is proposed to be used. Containers are placed and secured on their vessels at the loading Port (Fremantle Port) by the Port stevedoring company or service provider, and removed at the Port of destination by the stevedoring company or service provider at that Port. As such the cited carriers provide a marine carrier service and all actual handling of containers (on and off vessels) is predominately undertaken by stevedoring companies at each Port. There are some exceptions where the port does not have equipment to lift containers on and off the vessel, in which case, Maersk, services Punta Arenas and Puerto Deseado with "geared" vessels that have their own lifting gear for the sea containers.

In most instances, AGR cyanide is unloaded at terminals en-route to its final destination. This is known as trans-shipping and involves temporary set down within a Port facility before loading onto another vessel for continuation of the shipment delivery. AGR does not have any control over this trans-shipping, as the cited carriers select when and where it occurs. However, through its due diligence process, AGR has satisfied itself that all carriers conduct themselves in accordance with the IMO DG Code and in a professional manner, which extends to the selection of terminals for trans – shipping.

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from Fremantle Port to the destination country. AGR does not consign any solid sodium cyanide on a vessel that is not a container vessel.

AGR does not have control of the routes taken by the carriers, but has undertaken due diligence assessments of the cited carriers to verify that the shipments are in accordance with the IMO DG Code. AGR's due diligence assessments have found that there were no issues of concern in regards to the management and shipping of cyanide product by any of the carriers. In addition, through their dealings with the carriers, AGR has found the cited carriers to be professional organizations.

The routes taken are not 'definitive' routes as ships can take various routes to arrive at the same destination, taking into account tides, currents, wind and storms. This is also noted in the schedules with estimated travel times between Ports.

AGR conducts triennial due diligence assessments of carriers to identify potential risks. The measures taken to address risks identified for carriers are addressed within the due diligence process.

The due diligence assessments did not identify any requirement for additional safety or security.

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.*

**AGRs Ocean Freight Supply Chain is:**

- in full compliance with Transport Practice 1.2**
- in substantial compliance with
- not in compliance with

*Basis for this Finding:*

AGR utilises the cited carriers for marine transport of cyanide to various destination Ports. Containers are placed and secured on their vessels at the loading Port by the Port stevedoring company or service provider and removed at the Port of destination by the stevedoring company or service provider at that Port. There are some exceptions where the port does not have equipment to lift containers on and off the vessel; such as the ports of Punta Arenas and Deseado where Maersk, which carries AGR cyanide to these ports, will utilise a vessel with its own lifting gear to offload the sea containers.

Ports are not included in the scope of this audit and are assessed under due diligence as part of a separate supply chain.

All cited carriers' vessels are registered by the Lloyd's Register Group, which provides classification and certification of ships, and inspects and approves important components and accessories.

The cited carriers undertake to provide their employees with all the necessary training to support them in their jobs. Generally the carriers coordinate training and offer guidance in the handling and management of hazardous materials, dangerous goods and chemicals to which operating personnel may be exposed.

Due diligence assessments of the cited carriers were undertaken by AGR to verify that the shipments are conducted in accordance with the IMO DG Code. AGR's due diligence assessments have found that there were no issues of concern in regard to the management and shipping of cyanide product by any of the carriers.

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

**AGRs Ocean Freight Supply Chain is:**

- in full compliance with Transport Practice 1.3**
- in substantial compliance with
- not in compliance with

*Basis for this Finding:*

Carriers used by AGR have equipment operation and maintenance capabilities and procedures that are not dependent on AGR. The ability of the carriers to operate safely, and their capability to handle dangerous goods is assessed during the due diligence process.

AGR conducts triennial due diligence assessments for carriers in its Supply Chain.

In addition, all vessels that bring trade to and from Australia are required under the Australian Customs Act to be Lloyds registered. Lloyd's Register Group provides classification and certification of ships and inspects and approves important components and accessories.

They are also subject to Port State Control (PSC) where the vessels can be randomly inspected to ensure that vessels are seaworthy, do not pose a pollution risk, provide a healthy and safe working environment and comply with relevant international regulations.

The completed due diligence assessments found that there were no issues of concern with regards to the management and shipping of cyanide product by any of the carriers.

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

**AGRs Ocean Freight Supply Chain is:**

- in full compliance with Transport Practice 1.4**
- in substantial compliance with
- not in compliance with

*Basis for this Finding:*

Product packaging is undertaken at the ICMI certified Kwinana production facility and cyanide is packaged and transported in accordance with international regulatory standards, thereby meeting the requirements of the political jurisdictions through which the loads will pass.

All the cited carriers require from AGR, evidence that products booked for transport meet the packaging requirements of the IMO DG Code. Some carriers reserve the right to refuse acceptance of cargo that does not meet packaging, container and documentation standards as set out in the Code.

Due diligence assessments of the cited carriers were undertaken to verify that the shipments are conducted in accordance with the IMO DG Code. AGR's due diligence assessments have found that there were no issues of concern in regard to the management and shipping of cyanide product by any of the carriers.

Solid sodium cyanide remains sealed and packaged within locked shipping containers until it reaches the end use destination.

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

**AGRs Ocean Freight Supply Chain is:**

- in full compliance with Transport Practice 1.5**
- in substantial compliance with
- not in compliance with

*Basis for this Finding:*

All shipments of AGR cyanide comply with the IMO DG Code. This includes packaging, labelling of IBCs, placarding of containers, damage inspections, supply of correct documentation and appropriate stowage and separation.

CSBP has a suite of standard operating procedures to ensure that all AGR shipments of solid sodium cyanide comply with the IMO DG Code.

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

**AGRs Ocean Freight Supply Chain is:**

- in full compliance with Transport Practice 1.6**
- in substantial compliance with
- not in compliance with

*Basis for this Finding:*

The due diligence reviews for the cited carriers state that all vessels have continuous means of tracking and communication during their voyages.

Additionally, each service provider has systems in place to track individual containers from point of origin through to the destination Port.

Communication equipment is tested through continuous use. Ships subject to SOLAS requirements are required to test key communication equipment annually.

All cited carriers' vessels are registered by the Lloyd's Register Group, which provides classification and certification of ships, and inspects and approves important components and accessories.

Blackout areas have not been identified. However, all vessels have continuous means of tracking and communication during their voyages.

The cited carriers have software that tracks containers from the time they are released by AGR, right through the shipping process and until they are received back at their container yards.

Chain of custody documentation is used by the carriers to prevent the loss of AGR cyanide during shipment. This documentation includes the MO41 Document, which accompanies each container, and the ships manifest, which identifies the location and content of each container on the vessel. In addition, all carriers have computer tracking software to allow them to identify at which phase of shipment each container is in.

AGR requires that their contractors carry records indicating the amount of cyanide in transit and that Safety Data Sheets (SDSs) are available during transport.

The amount of cyanide in transit, the packing certificates and the SDS are contained within the marine documentation, this includes the shipper's declaration, container packing certificate and quarantine certificate, which accompany the cargo throughout the journey.

**2. INTERIM STORAGE: Design, construct and operate cyanide interim storage sites to prevent releases and exposures.**

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

**AGRs Ocean Freight Supply Chain is:**

- in full compliance with Transport Practice 2.1
- in substantial compliance with
- not in compliance with

*Basis for this Finding:*

Almost all of AGR's cyanide product is trans-shipped after leaving Australia, however AGR has no control over where trans-shipment of cyanide product is required. Depending on weather, cargo types and other operational matters, carriers may trans-ship their cargo from one vessel to another. This involves unloading the cargo at a terminal facility, temporary set down and loading onto another vessel for the continuation of the delivery.

The carriers must ensure that the IMO DG Code requirements for stowage and segregation are complied with during any temporary set down and loading on to another vessel.

AGR has no control over when and where this happens, but through the completion of due diligence assessments has satisfied itself that the carriers used undertake the trans-shipment of product in accordance with the IMO DG Code and regulations for the handling of dangerous goods pertinent to that Port.

**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.

**AGRs Ocean Freight Supply Chain is:**

- in full compliance with Transport Practice 3.1
- in substantial compliance with
- not in compliance with

*Basis for this Finding:*

Whilst AGR's product is embarked on the cited carrier's vessels, all emergency response is governed by the vessel's captain. AGR conduct due diligence assessments of carriers to verify that the shipments occur in accordance with the IMO DG Code. AGR's due diligence assessments found that

there were no issues of concern in regard to the management and shipping of cyanide product by any of the Supply Chain carriers.

AGR require carriers to have appropriate emergency response plans and capabilities for handling any cyanide incident that falls within their contractual responsibility.

Each operator implements their own system of safety and emergency response management that extends to emergency situations involving cyanide and other dangerous goods. Emergency responders, as well as dangerous goods technical experts, are available to respond and assist in emergency situations.

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

**AGRs Ocean Freight Supply Chain is:**

- in full compliance with Transport Practice 3.2**  
 in substantial compliance with  
 not in compliance with

*Basis for this Finding:*

Whilst AGR's product is embarked on the cited carrier's vessels, all emergency response is governed by the vessel's captain. AGR conducts due diligence assessments to verify that the shipments occur in accordance with the IMO DG Code. Due diligence assessments have found that there were no issues of concern in regard to the management and shipping of cyanide product by any of the carriers.

AGR require carriers to have appropriate emergency response plans and capabilities for handling any cyanide incident that falls within their contractual responsibility. The level of capability is assessed through the due diligence process.

The due diligences assessments found that the cited carriers each carry out the shipping of dangerous goods in accordance with the requirements of the IMO DG Code.

Each operator implements their own system of safety and emergency response management that extends to emergency situations involving cyanide and other dangerous goods at sea.

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

**AGRs Ocean Freight Supply Chain is:**

- in full compliance with Transport Practice 3.3**  
 in substantial compliance with  
 not in compliance with

*Basis for this Finding:*

The cited carrier's vessels carrying AGR cyanide have ship manifests held by the captain, which contain emergency response information and contact details.

Whilst AGR's product is embarked on the cited carrier's vessels, all emergency response is governed by the vessel's captain. AGR conducts due diligence assessments to verify that the shipments occur in accordance with the IMO DG Code. Due diligence assessments have found that there were no issues of concern in regard to the management and shipping of cyanide product by any of the carriers.

AGR require carriers to have appropriate emergency response plans, including current contact information, and capabilities for handling any cyanide incident that falls within their contractual responsibility.

AGR has a documented procedure for the notification of ICMI of any significant cyanide incidents.

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

**AGRs Ocean Freight Supply Chain is:**

- in full compliance with Transport Practice 3.4**
- in substantial compliance with
- not in compliance with

*Basis for this Finding:*

The cited carrier's vessels carrying AGR cyanide have ship manifests held by the captain, which contain emergency response information and contact details.

Whilst AGR's product is embarked on the cited carrier's vessels, all emergency response is governed by the vessel's captain. AGR conducts due diligence assessments to verify that the shipments occur in accordance with the IMO DG Code. Due diligence assessments have found that there were no issues of concern in regard to the management and shipping of cyanide product by any of the carriers.

AGR require carriers to have appropriate emergency response plans, including current contact information, and capabilities for handling any cyanide incident that falls within their contractual responsibility.

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

**AGRs Ocean Freight Supply Chain is:**

- in full compliance with Transport Practice 3.5**
- in substantial compliance with
- not in compliance with

*Basis for this Finding:*

The cited carrier's vessels carrying AGR cyanide have ship manifests held by the captain, which contain emergency response information and contact details.

Whilst AGR's product is embarked on the cited carrier's vessels, all emergency response is governed by the vessel's captain. AGR conducts due diligence assessments to verify that the shipments occur in accordance with the IMO DG Code. Due diligence assessments have found that there were no issues of concern in regard to the management and shipping of cyanide product by any of the carriers.

AGR require carriers to have appropriate emergency response plans, including current contact information, and capabilities for handling any cyanide incident that falls within their contractual responsibility.