



REPORT

Hebei Chengxin Transport Co., Ltd. – Turkey Supply Chain

ICMC CYANIDE TRANSPORTATION RE-CERTIFICATION AUDIT - SUMMARY REPORT

Submitted to:

International Cyanide Management Institute

1400 I Street, NW - Suite 550
Washington, DC 20005
UNITED STATES OF AMERICA

Submitted by:

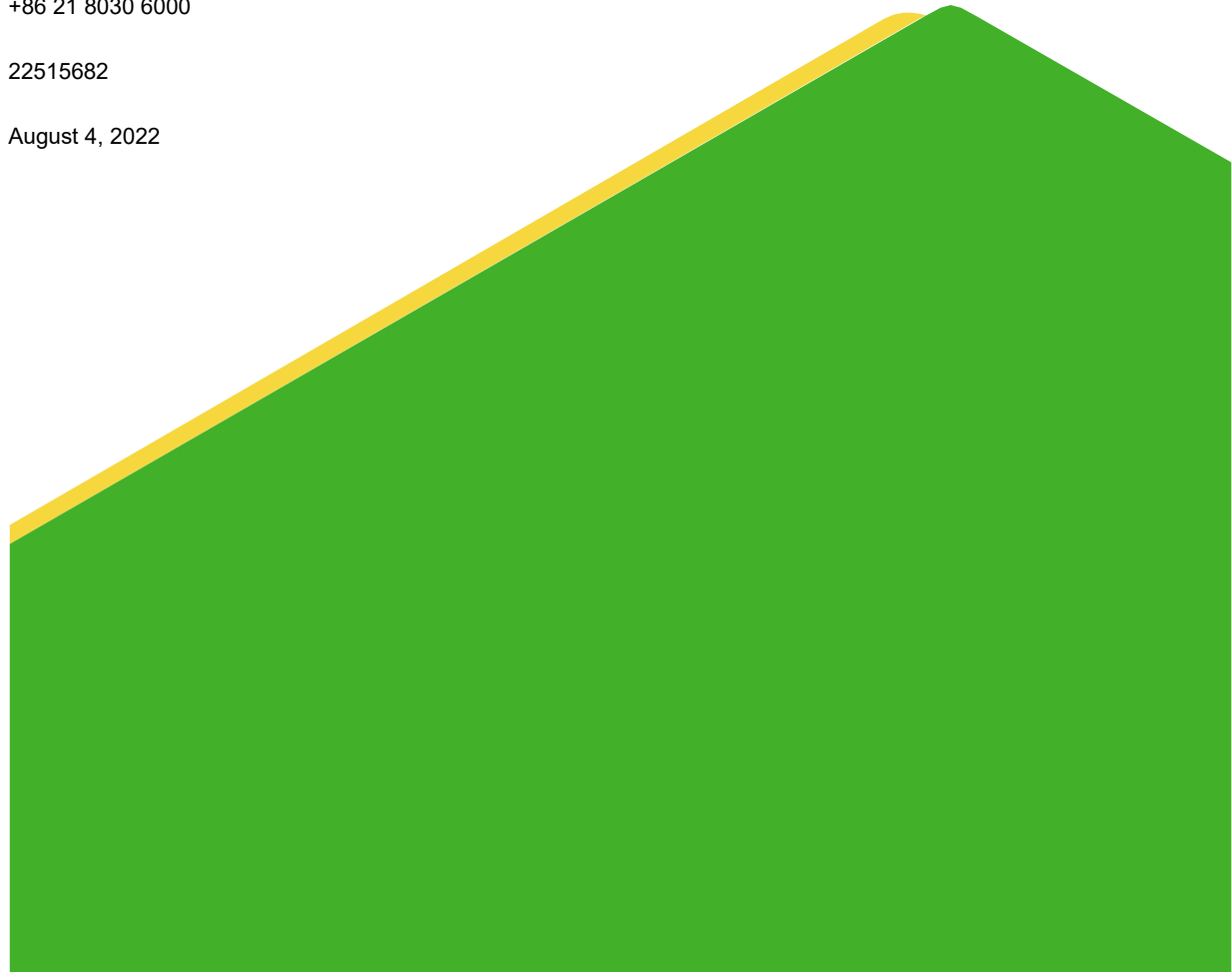
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August 4, 2022



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Turkey Supply Chain
Name of Facility

Anthony J. Jhu
Signature of Lead Auditor

August 4, 2022
Date

1.0 OPERATION GENERAL INFORMATION

Name of Cyanide Production Facility:	Hebei Chengxin - Turkey
Name of Facility Owner:	Hebei Chengxin - Turkey
Name of Facility Operator:	Hebei Chengxin - Turkey
Name of Responsible Manager:	Jason Li
Address:	Hebei Chengxin F/L 16th Zhongu Building No 170 Yucai Stret Yuhua District Shijiazhuang City
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2.0 SUPPLY CHAIN OVERVIEW

All road transportation in China is carried out by Hebei Chengxin Transport Co., Ltd (a consignor) an ICMC certified (Recertified January 2020) sister transport company of Hebei Chengxin Co., Ltd (the producer).

Hebei Chengxin Co., Ltd. (Hebei Chengxin) is the signatory company which is in the role of the ICMI Code's Consignor. The organization is not active in transporting cyanide but is contracting the full transport service.


This report focuses on transport of Cyanide from arrival in Turkey to mine Sites within Turkey which excludes the ports. The ports have been included in Global Ocean Supply Chain of Hebei Chengxin which certified in 10 August, 2020.

Initially Hebei Chengxin will focus on transport for Cyanide from the Ports of Izmir (Terminal Aliaga and Terminal Alsancak), Mersin, Trabzon to the Tüprag Gold mine (Tüprag) in Kışladağ of Uşak Province, Tümad Gold Mines (Tümad) in BALIKESİR of İVRİNDİ Province and ÇANAKKALE of LAPSEKİ Province. This includes the following stages:

- Part 1: Pick up at the Ports of Izmir (Terminal Aliaga and Terminal Alsancak), Mersin, Trabzon; Receiving the containers of cyanide. During the audit, client will transport the cyanide from Port of Mersin themselves. Port of Trabzon is the backup for Chengxin, which hasn't been used until the audit.
- Part 2, TO-PET; The transportation company collects the containers from the Ports of Izmir (Terminal Aliaga and Terminal Alsancak) and transports them in convoy to Tüprag and Tümad gold mines in Turkey.
- Part 3, Hydra; Emergency Response Service company, lead the emergency response activities and the convoy from the container collection to delivery to the mine site.

This transport routes have been planned, appropriate systems developed and applied, and trial transportation convoys have been undertaken. This report focuses on these routes.

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Hebei Chengxin may consider additional ports, routes and mine sites within Turkey in the future. If these are used, they will develop appropriate systems in advance of the convoys taking place. Hebei Chengxin will use ports under its Ocean Supply chain. Parties involved will be the same: TO-PET and Hydra.

3.0 AUDITORS FINDINGS

Hebei Chengxin in full compliance with **The international Cyanide Management Code**

in substantial compliance with

not in compliance with

3.1 Compliance Statement

This operation has not experienced any compliance issues or significant cyanide incidents during the previous three-year audit cycle.”

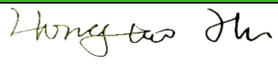
3.2 Auditor Information

The audit was undertaken by Hongtao Hu of Golder Associates from April 20 to May 10, 2022. Hongtao Hu’s information is as below:

Audit Company: Golder Associates Consulting Ltd.

Audit Team Leader: Hongtao Hu- Lead Auditor

Email: hongtao.hu@wsp.com


Name	Position	Signature	Date
Hongtao Hu	Lead Auditor and Transport Technical Specialist		August 4, 2022

3.3 Auditor Attestation

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, 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 Cyanide Transportation Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

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4.0 PRINCIPLES AND STANDARDS OF PRACTICE

4.1 Principle 1 – TRANSPORT

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

4.1.1 Standard of Practice 1.1

Select cyanide transport routes to minimise the potential for accidents and releases.

in full compliance with

The operation is

in substantial compliance with

Standard of Practice 1.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 1.1: Select cyanide transport routes to minimize the potential for accidents and releases.

The transporter has implemented processes and procedures to select transport routes that minimizes the potential for accidents and releases or the potential impacts of accidents and/or releases.

To-Pet has developed and implemented a management system for transportation and there is a specific written procedure *Route Maps Preparation, Transportation Routes Selection and Documentation of Stops* that details the process and the parameters to be assessed when identifying, selecting and assessing potential transport routes.

TO-PET has conducted the route risk assessment that is used as the basis for determining the route.

The following elements are considered as part of the route selection procedure:

- Road Structure and Road Condition;
- Emergency Lane;
- Trip Planning and Trip Length;
- Field Structure;
- Natural Events;
- Climate Conditions;
- Visibility;
- Night-Time Risks and Clarity;
- Security;
- Traffic Density - Road Risks – Speeds, Livestock and Agriculture;
- Population Density;
- Accident Likelihood (Black Spots and Hot Spots);
- Environment;
- Communication; and
- Immediate Support.

Ongoing monitoring of the routes is performed through daily logs made during each convoy and these are fed into the To-Pet route risk assessments. The supervisor will prepare the report and the daily logs and submit to their line managers and Chengxin.

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The transporter has implemented a procedure to evaluate the risks of selected cyanide transport routes and has taken measures to manage these risks.

The procedure of *Route Maps Preparation, Transportation Routes Selection and Documentation of Stops* involves the collection of route data and hazards by safety and dispatch personnel from driving the potential routes. The hazards are assessed against scoring system to generate the risk assessment. The assessment includes population density, proximity of water bodies, seasonal weather conditions, road surface condition. For all customer destinations there is a primary and alternative route. The primary route is selected on the basis of the lowest overall score and the alternative route will be used in the event the primary route is compromised (e.g. major construction, accident). Daily logs developed during each convoy are used to update the route risk assessments that are used. Authority of the highway will be called to assist the transportation if the road was on repairing.

Once assessed the management measures of the route, it will be documented in the Travel Risk Management Plan.

The transporter has implemented processes and procedures to periodically re-evaluate routes used for cyanide deliveries and have a process for getting feedback on route condition from the transporter's operators.

Daily logs developed during each convoy are used to update the route risk assessments. The route risk assessments will be updated annually.

Drivers are also briefed at the start of every consignment and start of each day and warned of any issues.

The transporter has documented the measures taken to address risks associated with the selected routes.

Hebei Chengxin, through its transporter (TO-PET) and ERT (Hydra), has documented the measures taken to address risks to the selected route identified in the route risk assessment.

TO-PET has detailed route instructions that apply to the entire routes, which describes the distances, speeds and hazards along the route. These are re-enforced by the convoy supervisor prior to each trip commencing.

The route risk assessments have been included in the Travel Risk Management Plan which will be updated approximately annually. Route assessments include lower speed on certain crossings, no overtaking on bends and maintaining safe driving practices.

Drivers are briefed at the start of every consignment.

The transporter has sought input from applicable governmental agencies, communities and other stakeholders as necessary in the selection of routes and development of risk management measures.

It is noted that the routes selected are main transport routes which are in good condition. Issues with the route are identified in advance of commencing the convoy (e.g. traffic issues) and changes are considered at this point in time.

According to the Travel Risk Management Plan, Hebei Chengxin (via TO-PET and Hydra) contacts Izmir Port, the Mine site, and hospitals along the route, and relevant information obtained influences the selection process. In addition, the latest conditions on the roads are supplied by a government agency and considered at the start of convoys.

The transporter has used convoys, escorts and additional safety and security measures as appropriate should the selected route(s) present special safety or security concerns.

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Zhongtao Jiu
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Hebei Chengxin reports (via To-Pet and Hydra) that there are no special safety or security concerns currently. However, if any such issues arise, they would re-evaluate their plans and modify them accordingly. For better management on emergency response, Hebei Chengxin has contracted Hydra to take convoys for the transportation in Turkey.

In addition to convoys, additional security measures are implemented for the material including the use of locked and sealed containers, as well as the use of locking plates, convoy monitors at the front and rear, and advising mines of expected arrival times.

The transport company has a procedure to ensure that its sub-contractors are compliant with this Standard of Practice.

Hebei Chengxin subcontracts TO-PET to carry out the transportation and route selection from Ports to Mine Sites in Turkey and Hydra to carry out the emergency planning and support. Hebei Chengxin has established International Vendor Performance Evaluation Procedure, which included the ICMI requirement for cyanide transportation.

Hebei Chengxin has conducted annual audit for To-pet and Hydra. The audit reports have been provided for review.

4.1.2 Standard of Practice 1.2

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

in full compliance with

The operation is

in substantial compliance with

Standard of Practice 1.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 1.2: Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

The transport company only uses trained, qualified and licensed operators to operate its transport vehicles.

TO-PET only uses trained and competent operators to operate its vehicles. There is a requirement in Turkey for drivers to be licensed for HGV vehicles and for dangerous goods transport (ADR certificates). TO-PET holds a record of all drivers used which includes SRC 5 Certificates which issued by Turkey Government for carrying Dangerous Goods in Turkey, contract with TO-PET, driver identification, driver license, ADR training certificate, resident's information, medical report and training certificates.

A range of training courses have been provided to drivers and include:

- HSE Induction;
- Emergency Response Plan;
- Cyanide Hazard Awareness.

TO-PET maintains a record of the training provided to personnel within a matrix.

TO-PET and the ERT (Hydra) were interviewed about their knowledge of the procedures and practices involving cyanide and provided good responses that demonstrated effective knowledge and experience.

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Hongtao Jiu

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All personnel operating cyanide handling and transport equipment have been trained to perform their jobs in a manner that minimizes the potential for cyanide releases and exposures.

TO-PET and the ERT (Hydra) personnel (i.e. including drivers) operating transport equipment have been trained to perform their jobs in a manner that minimises the potential for cyanide releases and exposures. And the training will be provided annually.

The training programme includes the following modules:

- HSE Induction
- ADR (for relevant TO-PET drivers)
- Emergency Response Plan
- Cyanide Hazard Awareness

TO-PET and the ERT (Hydra) maintain records of the training provided to personnel within a matrix.

The transport company has a procedure to ensure that its sub-contractors are compliant with this Standard of Practice.

Hebei Chengxin subcontracts TO-PET to carry out the transportation and route selection from Ports to Mine Sites in Turkey and Hydra to carry out the emergency planning and support. Hebei Chengxin has established International Vendor Performance Evaluation Procedure, which included the ICMI requirement for cyanide transportation.

Hebei Chengxin has conducted annual audit for To-pet and Hydra. The audit reports have been provided for review.

4.1.3 Standard of Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

in full compliance with

The operation is

in substantial compliance with

Standard of Practice 1.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 1.3: Ensure that transport equipment is suitable for the cyanide shipment.

TO-PET only use equipment designed and maintained to operate within the parameters of the cyanide loads it will be handling. Cyanide manufacturers and suppliers limit the mass of cyanide sent to the Mine to 22 tonnes per container. This is clearly shown on the chain of custody information provided with each shipment.

The weight of packaging (1.1 tonnes), container (around 3.6 tonnes) and trailer (around 3 tonnes) in addition to the 22 tonnes of cyanide gives a total weight of 29.7 tonnes.

Equipment used to transport cyanide loads consists of road vehicles (tractor units and trailers) that were purchased to a design specification appropriate for the cyanide transport task. These include main tractors with articulation and trailers which can carry only one container. The capacity of the trailer is 34 tonnes (although it is noted by TO-PET that the legal load limit is 34 tonnes) which is greater than the cyanide, packaging and container weights in total (29.7 tonnes). The tractor units have a capacity of 45 tonnes.

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TO-PET have registration certificates for all tractors and trailers and maintains records of vehicle specifications. Maintenance history is shown in vehicle log bookkept with each vehicle. Vehicles are maintained by the main dealer MAN and Mercedes suppliers.

Prior to the start of each convoy (and at points during the convoy) vehicles and trailers (along with their loads) are checked to ensure they are safe to travel.

In addition, vehicles are required to complete a TÜV inspection annually.

There are procedures to verify the adequacy of the equipment for the load it must bear.

Hebei Chengxin (Via TO-PET and Hydra) has developed procedures in place to verify the equipment is adequate for the load it must bear.

TO-PET requires use of equipment designed and maintained to operate within the cyanide loading parameters it will handle as stated in 1.3.1.

The Hydra Emergency Response Plan details the checks that should be made to the Emergency Response Vehicles during the convoy.

Pre-inspection record denote the load bearing capacity and actual load. A review of chain of custody confirmed shipments are within the load capacity of the vehicles.

There are procedures in place to prevent overloading of the transport vehicle being used for handling cyanide.

According to Travel Risk Management Plan, TO-PET ensures that vehicles are checked prior to and during transportation of cyanide. In addition, the specification of vehicle and trailer are compatible with the loads it carries. The loads each vehicle carries are always the same and this is verified at the start of the convoy by Hebei Chengxin during the ordering process, by TO-PET and Hydra during the planning of the convoy and collection of the cyanide at the port.

The transport company has a procedure to ensure that its sub-contractors are compliant with this Standard of Practice.

Hebei Chengxin subcontracts TO-PET to carry out the transportation and route selection from Ports to Mine Sites in Turkey and Hydra to carry out the emergency planning and support. Hebei Chengxin has established International Vendor Performance Evaluation Procedure, which included the ICMI requirement for cyanide transportation.

Hebei Chengxin has conducted annual audit for To-pet and Hydra. The audit reports have been provided for review.

4.1.4 Standard of Practice 1.4

Develop and implement a safety program for transport of cyanide.

The operation is **in full compliance with** **Standard of Practice 1.4**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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There are procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging.

Hebei Chengxin (via TO-PET and Hydra) follows written procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging.

The route risk assessments ensure routes are selected to minimise damage to vehicles and transported cyanide. The route for this supply chain is along good quality roads. Vehicles and trailers selected by TO-PET are designed to carry the loads safely. Inspections carried out by TO-PET and Hydra at the beginning of the convoy and during the convoy also ensure that the manufacturer's packaging integrity is maintained. Chain of custody forms completed by the mine also confirm that the material has been received in an effective state.

When the containers arrived the port, To-Pet will check the containers at the port the containers arrived the mine site, they will also inspect the inside of the container after unloading. They prepared the inspection report and send to Hebei chengxin. They also checked the seals of each container. If the government want to inspect the inside of the containers, they will break the seal. Then To-Pet will seal the containers again before transportation.

Vehicles carrying cyanide are also tracked by TO-PET using a GPS system. Monitoring is maintained with the convoy and in the event of an issue Hebei Chengxin, TO-PET and Hydra management are informed.

Vehicles and their loads are inspected at the Port and during the convoy. Chain of custody delivery notes are also provided to the Mine Site and retained by TO-PET.

Placards and signage are used to identify the shipment as cyanide and meet the requirements of local regulations or international standards.

Cyanide is delivered by sea to the ports in Turkey. Containers arrive with placards already in place as attached by the supplier, in accordance with the International Maritime Dangerous Goods (IMDG) Code. These placards remain on all sides of the containers until the containers are unpacked at the Mine Sites. These provisions and the attachment of the IMO marine pollutant label ensure that all consignments comply with international standards.

The placards used on containers, include:

- UN Numbers; and
- Hazchem classification.

The presence of each sign is checked at the port and during the journey. To-Pet will check the placards, if damage of the placards observed, To-Pet will prepare report and help to repair the placards.

The transporter has implemented a safety program for cyanide transport that includes:

- a) Vehicle inspections prior to every departure/shipment;
- a) A preventative maintenance program;
- b) Limitations on operator/driver hours;
- c) Procedures to prevent loads from shifting;
- d) Procedure to modify or suspend transportation if conditions require it;
- e) A drug abuse prevention program; and
- f) Retention of records documenting that the above activities have been conducted.

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Hebei Chengxin has implemented a safety program for cyanide transport through TO-PET and Hydra that includes (where appropriate or applicable) the following aspects:

- a) Vehicle inspections prior to each departure/shipment.
Vehicle inspection forms are completed on a daily basis during the convoy and were observed during the audit.
- b) A preventive maintenance program.
TO-PET has established maintenance schedule annually and uses an electronic system to flag maintenance requirements in advance. Maintenance records have been provided for review.
- c) Limitations on operator or drivers' hours.
Limitations on operator driver hours are managed by TO-PET. The limitation requirements are indicated in training and at the start of the convoy as well as being stated in the Driver's Manual. Vehicles are also fitted with a GPS system which tracks operational hours. (Maximum of 9 hours every day, 45 minutes rest are needed after 4.5 hours driving)
- d) Procedures to prevent loads from shifting.
Solid cyanide is stowed into the sea containers by the supplier. Vehicles and trailer units are designed to hold these containers in a secure manner. At the port of Izmir, freight containers are secured to vehicles using twist locks, which are designed and constructed to international transport standards. According to Travel Risk Management Plan, these are also checked at the start of the convoy and during each day of the convoy.
- e) Procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered
The TO-PET Manager and the Hydra Emergency Response and Convoy supervisor has authority to modify transport operations and consult with TO-PET drivers and management during a convoy. Discussion with TO-PET and Hydra confirmed that such communication does occur but that any change in route is expected to be very rare and would likely be due to road and weather conditions. Any such issues would be recorded.
- f) A drug abuse prevention program.
TO-PET has requirement about drug abuse prevention in Driving Rules for Road Transportation. The policy is implemented by drivers. The drug policy is discussed during cyanide training. TO-PET also instigates an alcohol testing process which is completed at the start of each trip. The supervisor conducts the test and keeps the records of the drivers' alcohol at the beginning and ending of the transport.
- g) Retention of records documenting that the above activities have been conducted.
Records are maintained and inspected for all relevant parts of this element as indicated adjacent to each finding. Records are retained by Hebei Chengxin or where relevant TO-PET and Hydra.

The transport company has a procedure to ensure that its sub-contractors are compliant with this Standard of Practice.

Hebei Chengxin subcontracts TO-PET to carry out the transportation and route selection from Ports to Mine Sites in Turkey and Hydra to carry out the emergency planning and support. Hebei Chengxin has established International Vendor Performance Evaluation Procedure, which included the ICMI requirement for cyanide transportation.

Hebei Chengxin has conducted annual audit for To-pet and Hydra. The audit reports have been provided for review.

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4.1.5 Standard of Practice 1.5

Follow international standards for transportation of cyanide by sea.

in full compliance with

The operation is

in substantial compliance with

Standard of Practice 1.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Standard of Practice 1.5; Is not applicable as the transporter does not ship cyanide by air.

4.1.6 Standard of Practice 1.6

Track cyanide shipments to prevent losses during transport.

in full compliance with

The operation is

in substantial compliance with

Standard of Practice 1.6

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 1.6: Track cyanide shipments to prevent losses during transport.

Transport vehicles have means to communicate with the transport company, the mining operation, and the cyanide producer or distributor and/or emergency responders, as appropriate.

Vehicles transporting for Hebei Chengxin have several means to communicate with Hebei Chengxin, with emergency responders and with the relevant mining operation.

Each convoy has one Supervisor vehicle and one emergency response vehicle which keep the convoy in view during the entire route. In the event of an issue one of the convoy team (Hydra and TO-PET) would initially follow the Hydra emergency response calling procedure and alert the relevant parties (depending on the incident).

In addition, each driver within the convoy has a mobile phone. Telephone numbers are provided in the Travel Risk Management Plan at the start of the convoy (the transport company, the mining operation, Hebei Chengxin, emergency responders, Hydra and other drivers) so drivers can get in touch with relevant persons in the event of an issue although drivers are not allowed to use mobile phones whilst driving.

According to the Travel Risk Management Plan, all vehicles transporting cyanide are fitted with GPS.

There are no black spots for the GPS for the routes that Hebei Chengxin is currently involved with. There are about 15 km to 20 kms distances with phone black spots for the routes. As reported, if any accident happened during this area, they would drive out of this area for help.

The communication equipment is periodically tested to ensure it functions properly.

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In accordance with Hydra and TO-PET's procedures and associated pre-convoy checks, communication equipment is checked prior to the start of each convoy.

As part of the pre-start inspection, all communication equipment is checked, including mobile phones and the GPS system. The inspection records have been provided for review.

Mobiles are checked at the start of each convoy to ensure they are working.

Communication blackout areas along transport routes have been assessed (from road trips) and about 15 km to 20 kms distances with black spots for the routes has been identified in the routes that Hebei Chengxin will use. As reported, if any accident happened during this area, they would drive out of this area for help.

Meanwhile, there are no black spots for the GPS for the routes that Hebei Chengxin is currently involved with. To-pet can view and track the location of the vehicles lively.

There are systems and procedures to track the progress of cyanide shipments.

Hebei Chengxin, Hydra and TO-PET have developed procedures in agreement with Hebei Chengxin to track the progress of cyanide shipments including the Emergency Response Plan.

Procedures include:

- Advising the mine when shipments leave the departure point and estimated time and date of arrival of the consignment (note normally takes 2 days from collection at port to arrival at mine)
- Logging of convoy movements using telephone calls from the mobile phones from Hydra to TO-PET at convenient stop points
- GPS (which is actively monitored) is also used to track progress along the routes

For each convoy, there is a designated departure time and arrival time (including for breaks and overnight stays) and every journey is logged to monitor progress (departure, interim stops, overnight stops etc). All logs are documented.

The transporter has implemented inventory controls and/or chain of custody documentation to prevent loss of cyanide during shipment.

Shipments are inspected at the start of the convoy and at periods during the convoy. These include visual integrity checks.

Chain of custody (Delivery Notes) forms completed by the mine also confirm that the material has been received in an effective state.

Shipping records (chain of custody) indicate the amount of cyanide in transit and Materials Safety Data Sheets are available during transport.

A copy of the Safety Data Sheet with English Version and Turkish Version in the Emergency Response Plan of Hydra has been carried by each driver.

TO-PET provided a number of documents indicating the amount of cyanide involved in shipments during the last three years.

The transport company has a procedure to ensure that its sub-contractors are compliant with this Standard of Practice.

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Hebei Chengxin subcontracts TO-PET to carry out the transportation and route selection from Ports to Mine Sites in Turkey and Hydra to carry out the emergency planning and support. Hebei Chengxin has established International Vendor Performance Evaluation Procedure, which included the ICMI requirement for cyanide transportation.

Hebei Chengxin has conducted annual audit for To-pet and Hydra. The audit reports have been provided for review.

4.2 Principle 2 – INTRIM STORAGE

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

4.2.1 Standard of Practice 2.1

Store cyanide in a manner that minimizes the potential for accidental releases.

in full compliance with

The operation is

in substantial compliance with

Standard of Practice 2.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Standard of Practice 2.1 is not applicable as Hebei Chengxin does not undertake any interim storage of cyanide.

4.3 Principle 3 – EMERGENCY RESPONSE

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

4.3.1 Standard of Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

in full compliance with

The operation is

in substantial compliance with

Standard of Practice 3.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 3.1: Prepare detailed emergency response plans for potential cyanide releases.

The transporter has an Emergency Response Plan.

Hebei Chengxin have a contract with Hydra to develop and implement an Emergency Response Plan. The plan applies to TO-PET (transportation company). This is the document to be used in the event of an emergency involving cyanide.

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The document has the following sections:

- Purpose and Scope
- Descriptions
- Roles, responsibilities and Training
- Equipment and Maintenance
- Communication Plan
- Documents and Sources to be Referred
- Emergency Response operations and Transport Services
- Medical and Physical Health Conditions
- Reporting
- Vehicles
- Weather Forecast Reports
- Attachments

To-pet has also developed an ERP which will also be referred in the event of an emergency involving cyanide.

The Emergency Response Plan is appropriate for:

- a) The transportation route.
- b) The physical and chemical form of the cyanide.
- c) The method of transport.
- d) The transport infrastructure (e.g., condition of the road, railway, port).
- e) The design of the transport vehicle or interim storage facility.

The Emergency Response Plan of Hydra has included the following sections:

- 9.1.1 Routes Safety Checks of Emergency Services
- 8.1. General Risk and Hazards of Cyanides (8.1.1. Chemical Hazards & 8.1.5. Physical Hazards)
- 9.4. Transport Escort Services
- 9.3. Site Safety Plan
- 9.2. Vehicle Safety Checks

No interim storage facility used during the transportation.

The Emergency Response Plan of Hydra include descriptions of response actions, as appropriate for the anticipated emergency situation.

Section 9.5.2. Response Levels of the Emergency Response Plan of Hydra details Three Levels of response as below:

- Level 1: Accident on road without product release and no person injured
- Level 2: Accident on road including product release, no water involved
- Level 3: Accident on road or on harbor with product release and water involved

Actions of Hebei Chengxin and emergency response team of To-pet and Hydra have been specified for each response level.

The Emergency Response Plan of Hydra has identified the roles of external responders, medical services or communities in emergency response procedures and have they been advised of their roles.

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The Emergency Response Plan of Hydra includes a communication plan in the event of an incident including the telephone numbers for emergency services and local hospitals. The role of the medical providers is noted.

The need for calling on national and international experts and teams for a significant incident is also noted along with the relevant contact numbers.

Details of roles for government officials (including police, firefighters, ambulance service), and the Hebei Chengxin Emergency team are also identified within the plan.

The Emergency Response Plan considers the design of the transport vehicle and storage facility.

The Emergency Response Plan of Hydra states the vehicles used are stated as either MAN or Mercedes trucks with twenty feet long trailers.

The Emergency Response Plan of Hydra also states that solid cyanide is packed by the cyanide manufacture in heavy duty plastic bags inside nylon bulk bags which are packaged into UN approved wooden IBCs or drums, which are in turn placed within metal shipping containers for transportation.

The Emergency Response Plan of Hydra further states that containers are loaded from a back door within the container before being loaded onto the vehicle. In the event of an accident/incident drivers are instructed to inspect for signs of cargo damage or leakage as part of their assessment and information to pass on to the emergency services.

The containers are loaded onto the trailer and twist locks fitted to prevent movement.

The Emergency Response Plan includes descriptions of response actions as appropriate for anticipated emergency situations.

The Emergency Response Plan of Hydra considers a number of emergency situations and categorises the level of response (Level 1 to 3 with Level 3 being the most severe).

The document has the following sections which specifically describe the response actions for support during an incident and general actions to be considered including:

- Protect individuals, alerting others, securing the incident area, defining the incident zone, containing the spill, using suitable packaging, chemical treatment, spill scenarios, contamination of waterways, and;
- Medical and Physical Health conditions and reporting.

The Emergency Response Plan of Hydra and To-pet also include various release scenarios and considerations.

4.3.2 Standard of Practice 3.2

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

The operation is **in full compliance with** **Standard of Practice 3.2**
 in substantial compliance with
 not in compliance with

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Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response.

The transporter has provided initial and refresher emergency response training to appropriate personnel.

Hydra provides cyanide awareness training to TO-PET drivers and the supervisor and also to the Hydra emergency response team. Additional HSE training is provided to all parties including basic job training, PPE, working with chemicals, field training, use of equipment, technical safety, environmental protection.

Hydra has developed an Annual Training Plan for the Emergency Response teams and this includes training on the Emergency Response Plan (refresher every year), HAZMAT training, ADR training, PPE Usage, Cyanide Response, C.P.R and First Aid Training. The training records have been provided for review.

Interviews were conducted with Hebei Chengxin, Hydra and TO-PET. This demonstrated that personnel operating cyanide transport equipment or involved in the convoys are appropriately trained and had a good understanding of what to do in the event of an emergency.

There are descriptions provided of specific emergency response duties and responsibilities of personnel.

The Emergency Response Plan identifies the key roles and responsibilities in the event of an emergency for the following positions:

- Drivers;
- Emergency Responders (police, firefighters, ambulance service);
- Hebei Chengxin Emergency Response Team.

Specific duties are also stated within the procedure for each emergency scenario considered.

The requirements are included in training programmes. During interviews with Hebei Chengxin, TO-PET and Hydra staff, they were asked about their roles and the answers were consistent with the procedures.

There is a list of all emergency response equipment that should be available during transport and along the transportation route.


The emergency response equipment is supplied by Hydra which will be stored in the emergency response vehicles. *Table 2. PPE of Emergency Response Staff* of the plan has listed all the PPE required for emergency response in the convoy.

Table 3. Response Equipment inside Emergency Response Vehicles in the plan has listed all the response equipment for the convey which mainly included: HCN detectors, ABEK filter respirators and full-face masks, SCBA and oxygen cylinders, chemical protective gloves and suits (Level A, B and C), chemical resistant boots, first aid kit, stretcher, alcohol test kit, polythene covers (various sizes), chemical sorbent pad and boom, lighting, decontamination set, fire extinguishers, table and chairs, PC tablet, sample bottles, generator, air compressor, cyanide antidote brochure, ladder, plastic drums, tools, traffic control equipment.

An emergency response vehicle and associated equipment will be inspected before the transportation.

According to the Emergency Response Plan of Hydra the equipment is checked monthly using a check list. This list is also used to check the equipment prior to each convoy starting.

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The transporter has the necessary emergency response and health and safety equipment, including personal protective equipment available during transport.

According to the Emergency Response Plan of Hydra, checklist is used to confirm that the equipment is available on the vehicle used in the convoy prior to the convoy commencing.

There are procedures to inspect the emergency response equipment and assure its availability when required.

According to the Emergency Response Plan of Hydra, the equipment is checked monthly using a check list. This list is also used to check the presence / absence and the condition of the equipment prior to each convoy starting.

The transport company has a procedure to ensure that its sub-contractors are compliant with this Transport Practice.

Hebei Chengxin subcontracts TO-PET to carry out the transportation and route selection from Ports to Mine Sites in Turkey and Hydra to carry out the emergency planning and support. Hebei Chengxin has established International Vendor Performance Evaluation Procedure, which included the ICMI requirement for cyanide transportation.

Hebei Chengxin has conducted annual audit for To-pet and Hydra. The audit reports have been provided for review.

4.3.3 Standard of Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 3.3**

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 3.3: Develop procedures for internal and external emergency notification and reporting.

There are procedures and current contact information for notifying appropriate entities such as the cyanide producer, the customer, regulatory agencies, external response providers, medical facilities and potentially affected communities of an emergency.

Section 9.5.3. Notification Procedure for Hydra in case of Emergency of the Emergency Response Plan details the notification process in the event of an incident which included the Notification Flow Chart of Hydra.

Section 9.5.4. Communication / Alerting in case of Emergency details the flow of information between all responsible parties in case the emergency situation results in product spillage or unloading of product is necessary.

FIGURE 2. EMERGENCY CONTACT NUMBERS has listed all internal and external contacts is provided and includes the mine site.

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Hebei Chengxin (via TO-PET and Hydra) contacts Ports, the Mine site, and hospitals along the route. Hydra has a written ERP and this clearly states the roles and responsibilities of external parties. Calls are made by Hydra every six months to the emergency responders to check contact numbers and ask hospitals about their ability to provide a cyanide antidote.

National and Local Government responders (Governorship, Environmental department, Health Department, Police, Fire, Health Emergency, Highways, Coastguard) have direct codes and these numbers remain the same and are also stated in the contact list.

Systems are in place to ensure that internal and external emergency notification and reporting procedures are kept current as indicated.

This contact information in the Emergency Response Plan of Hydra is reviewed by Hydra every six months and external responders contacted by phone to confirm details.

According to the interview with To-pet and Hydra, the latest contract numbers have been updated in 2021.

The operation has a procedure for notifying ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. No such significant cyanide incident has occurred.

In the Emergency Response Plan of To-pet, the requirement for notifying the ICMI of any significant cyanide incidents has been specified as below:

If any significant cyanide incidents happened, the operation manager of To-pet will inform the authorized customer and ICMI officer. After the accident, a detailed report will be sent to the customer and ICMI officials.

4.3.4 Standard of Practice 3.4

Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 3.4**

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

There are procedures 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.

The Emergency Response Plan identifies actions to be considered depending on the incident, location and weather conditions. Key actions identified include containment of any spill and clean-up of solid spills. No chemical treatment is recommended in the plan.

The procedure includes details to follow in the event of a spill including:

- Protect Yourself (PPE)

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- Alerting
- Secure Area
- Define Hot Zone
- Cover / Contain spilled product
- Use suitable salvage packaging
- No chemical treatment on spillage site
- Chemical analysis
- Personnel hygiene documentation

An operational checklist is used to guide the clean-up process.

The plan also identifies external responders who would provide support in the event of an incident. If the spillage has contaminated any water source or the soil, promptly informs local fire brigade by dialing 110 and alerts HYDRA call-center (HCC).

The procedures prohibit the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water.

The Emergency Response Plan of Hydra states “Do not use any chemical to destroy the remaining cyanide. Use adsorbing material like sand to clean up the remaining cyanide. This material must be disposed of or be recycled according to national regulations”.

4.3.5 Standard of Practice 3.5

Periodically evaluate response procedures and capabilities and revise them as needed.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 3.5**

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 3.5: Periodically evaluate response procedures and capabilities and revise them as needed.

There are provisions for periodically reviewing and evaluating the Plan’s adequacy and they will be implemented.

The Emergency Response Plan of Hydra states that it will be next reviewed on 15 January 2024. And ERP of To-pet states that it will be next reviewed on 1 February 2024.

Hydra and Hebei Chengxin representatives confirmed that the plan is reviewed on every three years basis with additional changes occurring based on changes to the system that may occur from time to time.

There are provisions for periodically conducting mock emergency drills and they have been and will continue to be implemented.

In Turkey, Emergency Response teams are required to carry out mock drills at least twice a year. Hydra has conducted the mock drills twice a year. And the mock drills are also identified in the Annual Training Plan

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which included the release accident and leakage accident scenarios. However, no mock drills conducted in 2020 due to the Covid-19 affect.

According to the interview with To-pet and Hydra, they will conduct the mock drill in July for 2022.

There is a procedure to evaluate the Plan's performance of the after its implementation and this will be as needed, and they have been implemented.

The Emergency Response Plan Revision Records of Hydra and To-pet details the date of publication, new revision number and a description of the revision.

The document history shows that a number of variations have been implemented over the past three years. The latest version of Hydra and To-pet have been updated on 17 January 2021 and 5 January 2020 individually.

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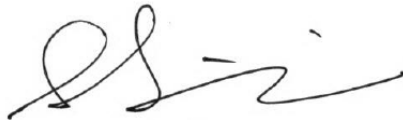
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