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Mapai Transport Limited

**Mapai Transport Limited**

International Cyanide  
Management Code  
Certification Audit -  
Summary Audit Report



March 2024

Public

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## Mapai Transport Limited

### International Cyanide Management Code Certification Audit - Summary Audit Report

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A	16 January 2024	DRAFT for review
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	Name	Date	signature
Prepared by:	Lauren Sandon	27 March 2024	
Reviewed & Approved by:	Ed Clerk	27 March 2024	

WSP acknowledges that every project we work on takes place on First Peoples lands.  
We recognise Aboriginal and Torres Strait Islander Peoples as the first scientists and engineers and pay our respects to Elders past and present.

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# 1 Summary Audit Report

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## 1.1 Operation General Information

<b>Name of Transport Operation:</b>	Mapai Transport Limited
<b>Name of Facility Owner:</b>	Mapai Transport Limited
<b>Name of Facility Operator:</b>	Mapai Transport Limited
<b>Name of Responsible Manager:</b>	Robin Stevens
<b>Address:</b>	4 <sup>th</sup> Street, JT's Maman Anda Building, Lae
<b>State/Province:</b>	Morobe Province 411
<b>Country:</b>	Papua New Guinea
<b>Telephone:</b>	+675 7092 2000
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## 1.2 Operation Location Detail and Description

Mapai Transport Limited (Mapai) is a transportation and logistics company engaged in the transportation of goods within the Morobe Province of PNG.

The scope of the Mapai Certification Audit is the road transportation of cyanide from the Port of Lae to customer mine sites within PNG, however the Port of Lae is not included. At the time of the Transport Certification Audit, Mapai's last delivery to a customer was in late 2019 (Porgera Gold Mine) and transportation of cyanide had not recommenced.

Upon arrival at the Port of Lae, the offloading of all containers is performed by stevedores. Once the cyanide containers are collected from the Port, they are taken to the Mapai Transport Yard where they are stored on the truck overnight in preparation for convoy departure the following morning. At no stage is cyanide removed from the trucks or containers prior to unloading at Barrick's Porgera Gold Mine site (BPGM), which is approximately 700 km away in the Enga Province of PNG. The mine was placed into care and maintenance in April 2020 and is proposed to resume production in the first quarter of 2024.

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol.

Storage in transit may occur at the mines depot in Lae in the event that planned delivery is delayed. Overnight stops are designated along the route; however, the containers remain on the trailers.

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## 1.3 Auditors Findings

Mapai Transport Limited is:

in full compliance with

in substantial compliance with

not in compliance with

**The International  
Cyanide Management  
Code**

No significant cyanide incidents or cyanide exposure and releases were noted as occurring during the audit period.

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## 1.4 Auditor Information

Audit Company: WSP Australia Pty Ltd (WSP)

Audit Team Leader: Ed Clerk (ICMI Technical Specialist)

Email: [ed.clerk@wsp.com](mailto:ed.clerk@wsp.com)

Name and Signature of other Auditors:

Table 1.1 Name and Signature of Other Auditors

Name	Position	Signature	Date
Lauren Sandon	Auditor		27/03/2024

The field component of the audit was undertaken over 14<sup>th</sup> – 16<sup>th</sup> of August 2023.

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## 1.5 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.


Name of Operation: Mapai Transport Limited

Signature:



Date: 27/03/2024

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Date: 27/03/2024

  
Signature of Lead Auditor

# 2 Principles and Standards of Practice

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## 2.1 Principle 1 – Transport

### 2.1.1 Transport Practice 1.1

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

The operation is  in full compliance with Transport Practice 1.1  
 in substantial compliance with  
 not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

Mapai is in FULL COMPLIANCE with Transport Practice 1.1 requiring the selection of cyanide transport routes ensures minimising the potential for accidents and releases.

Mapai has developed and implemented a Route Assessment (Cyanide) procedure to assess the population along the route, condition and infrastructure of the road, and road hazards along the route.

Mapai has also documented this via its Dangerous Goods Route Assessment which details road hazards along the route, the personnel involved in the assessment, the assessed risk level and controls.

A Journey Management Plan (JMP) is completed for each convoy that includes information on the route condition from the mine site and previous convoys. The JMP is the tool used to manage convoys and track progress of the convoy. Controls surrounding fatigue and approval stops along the route are included.

Mapai maintains surveillance of conditions through feedback from the convoys for all types of cargo. The Escort Commanders also provide feedback to the Operations Manager/Dangerous Goods (DG) Transport Manager through daily updates along the route and post convoy debrief.

Mapai's Transport Community Liaison officer utilise the knowledge and network of the mine client to facilitate the consultation process to seek input from communities and other stakeholders as necessary, which is outlined in the route assessment procedure. Mapai also send a notification to the mine prior to each convoy to assess if there are any issues with the route including community or stakeholders.

Designated Escorts are provided at the front and rear of the convoy and the Escort Commander is in charge of the convoy. Mapai also has a relationship with security contractors that patrol the transport route that can be called upon to attend an incident if necessary.

### 2.1.2 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.**

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

**Summarise the basis for this Finding/Deficiencies Identified:**

Mapai is in FULL COMPLIANCE with Transport Practice 1.2 to ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

Only trained and licensed operators are used to operate Mapai’s transport vehicles.

The Cyanide Transport Management Plan (CTMP) mandates the following to be completed by Drivers:

- Cyanide Awareness Training
- Cyanide Emergency Response
- CTMP Driver Responsibilities
- Fatigue Management

Drivers also require a current Papua New Guinea (PNG) drivers licence which is recorded in the Driver’s Licence Register. Training packages are provided in English and translated into Pigeon by the DG/Health, Safety and Environment (HSE) Manager.

Evidence was provided to confirm that drivers are trained through a peer observation program progressing from general cargo through to Dangerous Goods. Drivers must complete the training modules which include assessment questions before being able to take part in a cyanide convoy.

### 2.1.3 Transport Practice 1.3

**Ensure that transport equipment is suitable for the cyanide shipment.**

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

**Summarise the basis for this Finding/Deficiencies Identified:**


Mapai is in FULL COMPLIANCE with Transport Practice 1.3 ensuring that transport equipment is suitable for the cyanide shipment.

Only equipment designed and maintained to operate within the loads it will be handling is used. The Kenworth prime movers used by Mapai have carrying capacity for 26 000 kg and the drop deck trailers are rated to 40 000 kg. These are used to transport a single 24 000 kg container on a drop deck trailer.

The containers are centre loaded with additional weight placed above the goose neck (1 drum of grinding balls – 860kg) to provide additional downward force on the drive axel to better handle steep inclines on unsealed roads.

The maintenance of trucks and trailers are managed in Fleetmate. They undergo 3 services:

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- ‘A’ service is a daily service conducted both before and after convoys
- ‘B’ service is every 10,000 km (oils and filters)
- ‘C’ service is every 40,000 km (complete overhaul)

In addition, a three monthly inspection is conducted on all cyanide trailers. Both the prime movers and trailers also require pre-start safety checks using the Prime Mover and Trailer Pre-Start Checklist.

The CTMP details that a single cyanide container is carried on a step deck trailer and there is one trailer per prime mover to prevent overloading.

#### 2.1.4 *Transport Practice 1.4*

##### **Develop and implement a safety program for transport of cyanide.**

in full compliance with

The operation is  in substantial compliance with Transport Practice 1.4

not in compliance with

##### **Summarise the basis for this Finding/Deficiencies Identified:**

Mapai is in FULL COMPLIANCE with Transport Practice 1.4 and have developed and implemented a safety program for transport of cyanide.

Solid sodium cyanide is transported in wooden intermediate bulk containers with double bag lining within sea containers. Mapai inspect seals that are applied to the doors of the sea containers at the production facility when collecting them from the Port.


The Escort Commander is responsible for conducting and recording the checks throughout the convoy and at the point of delivery to the mine. At no time during the convoy does Mapai open the containers.

Placards (diamonds) are placed on the front and rear of the transport vehicle and there is signage on the container. The pictograms and Hazchem codes on the diamonds are consistent with those presented in the Australian Dangerous Goods Code.

Mapai has implemented a safety programme for cyanide transport that includes:

- a) Vehicles inspections by the drivers and checked by the escort leaders before each departure.
- b) A preventative maintenance regime which includes a 3-monthly minimum maintenance regime for the trailers transporting cyanide. Both the prime movers and trailers also require pre-start safety checks using the Prime Mover and Trailer Pre-Start Checklist.
- c) Limiting driver hours on a given day to approximately 12 hours. A minimum 8 hours rest prior to each shift is required together with a minimum 24 hours rest before commencing the convoy.
- d) Ensuring twist locks on drop deck trailers are inspected when the container is secured to the trailer and then periodically through the convoy including pre-departure each day to prevent shifting loads.
- e) The Transport Management Plan (TMP) provides procedures by which transportation can be modified or suspended if necessary, by considering road conditions, weather and security issues.
- f) Providing education and awareness information in relation to the effects of drugs and alcohol, as well as ensuring fit testing measures for blood alcohol.

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g) Retention of records documenting that the above activities have been conducted.

### 2.1.5 Transport Practice 1.5

**Follow international standards for transportation of cyanide by sea.**

The operation is  in full compliance with Transport Practice 1.5  
 in substantial compliance with  
 not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

Not Applicable.

Mapai does not intend to transport consignments of cyanide by sea within the scope of this audit and therefore this practice is not applicable.

### 2.1.6 Transport Practice 1.6

**Track cyanide shipments to prevent losses during transport.**

The operation is  in full compliance with Transport Practice 1.6  
 in substantial compliance with  
 not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

Mapai is in FULL COMPLIANCE with Transport Practice 1.6 by tracking cyanide shipments to prevent losses during transport.

Mapai communicates with the drivers and provides instruction via radio, mobile, satellite phones and via an in-vehicle management system IVMS fitted to the prime mover.

Communication equipment is periodically checked for functionality and is part of routine checks. The IVMS provides real time data on the location and activity of the vehicles.

A route assessment concluded that there were three mobile phone blackspots identified however alternate coverage is provided in these locations through the satellite phones and IVMS.

The vehicles are fitted with GPS tracking and the real time location of the convoy is monitored in the control room in Lae 24 hours a day. Journey management plans also require escorts check in along the route.

Each container collected from the port is accompanied by chain of custody documentation and the container is checked against the bill of lading. This inspection also checks that the seals placed on the container are intact.

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

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## 2.2 Principle 2 – Interim Storage

### 2.2.1 Transport Practice 2.1

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

The operation is  in full compliance with  in substantial compliance with  not in compliance with Transport Practice 2.1

**Summarise the basis for this Finding/Deficiencies Identified:**

Not Applicable.

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol.

Storage in transit may occur in the event that transport is delayed at the Lae Depot. In this instance, the containers are stacked door to door on top of empty containers (i.e., elevated with the door inaccessible).

Overnight stops are designated along the route; however, the containers remain on the trailers. These designated stopping locations (and the Lae Depot) are secured with a fence, guarded and signposted noting that cyanide is present, smoking and open flames and drinking are not allowed and what personal protective equipment (PPE) is required. The containers are also demarcated with Danger Tape.

No cyanide is removed from shipping containers when stored at the Lae Depot or designated overnight stopping locations.

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## 2.3 Principle 3 – Emergency Response

### 2.3.1 Transport Practice 3.1

#### Prepare detailed Emergency Response Plans for potential cyanide releases.

The operation is  in full compliance with  in substantial compliance with  not in compliance with Transport Practice 3.1

#### Summarise the basis for this Finding/Deficiencies Identified:

Mapai is in FULL COMPLIANCE with Transport Practice 3.1 in preparing detailed Emergency Response Plans (ERPs) for potential cyanide releases.

The CTMP outlines the response scenarios and action to be taken in the event of an emergency with the ERP complimenting the actions detailed in the CTMP.

The ERP is based on scenarios that have been derived from the transport management plan and route survey process. The response scenarios provided in the plan take into account the properties of the product in the response actions developed. The plan contains four scenarios that have been developed for foreseeable cyanide incidents along the transport routes.

- Scenario A – Cyanide Related Injury
- Scenario B – Cyanide Transport Event
- Scenario C – Fire Involving Cyanide
- Scenario D – Solid Cyanide Spills.

The scenarios are based on the route survey which takes into consideration the vehicles undertaking transport and the types of road hazards identified through the route assessment process.

Mapai utilise a Kenworth prime mover and a single wall sea container with wooden IBCs stored within the container that is secured to the trailer via twist locks. The container and IBCs provide multiple layers of protection from release in the event of an accident.

The Cyanide Transport Emergency Management Plan (CTEMP) details the actions to be taken in the event of an emergency including:

- Initial assessment of the scene
- Notification of the emergency
- First aid and evacuation of the area

Different response actions are provided for solid spills and those where the solid product has come into contact with water or liquids.

The CTEMP identifies the Barricks Porgera Gold Mine (BPGM) emergency response team (ERT) as the primary external responder for event that exceed the capability of the Mapai team.

### 2.3.2 Transport Practice 3.2

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

The operation is  in full compliance with  
 in substantial compliance with Transport Practice 3.2  
 not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

Mapai is in FULL COMPLIANCE with Transport Practice 3.2 by designating appropriate response personnel and commit necessary resources for emergency response.

The CTEMP requires escort personnel complete the following mandatory training modules:

- Cyanide Awareness Training
- Cyanide Emergency Response
- Cyanide Transport Management
- Cyanide Transport Emergency Management
- HCN Monitor Use
- PPE for use in an Emergency

In addition to the training outlined above the operation conducts mock exercises to test the response to identified scenarios and provide training on the response actions.

The CTEMP describes actions for the following roles:

- Mapai General Manager
- DG Transport Manager
- Escort Commander
- BPGM ERT

Drivers' responsibilities are also outlined and involve assisting the escort commander in securing the scene.

The ERP lists all the required emergency response equipment which is also in the pre-departure checks that are performed for each convoy. A review of completed pre-start checklists, interviews with escorts and site inspection confirmed equipment was available and in suitable condition for use.

The CTEMP details the training requirements and the refresher periods and this is tracked by through the training matrix.

A review of pre-departure records confirmed that Mapai has systems in place to check that equipment detailed is available during transport. An inspection of vehicles and interviews with drivers and escorts confirmed that the equipment was available and in serviceable condition.

### 2.3.3 *Transport Practice 3.3*

**Develop procedures for internal and external emergency notification and reporting.**

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

**Summarise the basis for this Finding/Deficiencies Identified:**

Mapai is in FULL COMPLIANCE with Transport Practice 3.3 by developing procedures for internal and external emergency notification and reporting.

The CTEMP provides the escalation process for notifying Mapai Management, the mine and the supplier including a list of key contacts within an appendix to the CTEMP. The contact list is updated on an annual basis as a minimum.

Community contact is managed through the interface with the mining operation with Mapai providing initial information on the location and nature of the emergency to the BPGM Emergency Team.

The Cyanide Transport Incident Management SOP states that the DG Transport Manager is responsible for notifying the ICMI of any significant incidents in line with the ICMI's Definitions and Acronyms document.

### 2.3.4 *Transport Practice 3.4*

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

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

**Summarise the basis for this Finding/Deficiencies Identified:**

Mapai is in FULL COMPLIANCE with Transport Practice 3.4 by developing procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

Mapai has made arrangements with BPGM for their ERT resources to respond and undertake recovery and neutralisation activities of spilled product should it be necessary. Mapai will provide logistical support to the BPGM ERT to enable neutralisation or recovery of product.

The pre-incident plans contained in the CTEMP note that neutralisation or decontamination procedures are not to be carried out if there is a risk of decontamination chemicals and by-products entering a water body. The procedure prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water.

### 2.3.5 Transport Practice 3.5

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

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

**Summarise the basis for this Finding/Deficiencies Identified:**

Mapai is in FULL COMPLIANCE with Transport Practice 3.5 by periodically evaluating response procedures and capabilities and revising them as needed.

The CTEMP requires review:

- Every three years, or:
  - After every incident which requires activation of the CTEMP,
  - Emergency exercises, where actions are identified that change the process,
  - Whenever there is a new, or a change to an existing, related procedure,
  - Transportation audits and assessments, as required; and/or
  - When there is a relevant organisational change.


CTEMP also provides that desktop and practical exercises will be undertaken every two years to evaluate their response and the adequacy of their plan.

Transport related mock drills are undertaken on a two-year basis. The organisation has undertaken mock drills for Solid Cyanide Spills, Cyanide Related Injury, and Fire Involving Cyanide between August and September 2023. Mapai has not had to activate the plan during the audit period and the reviews have been based on the mock drills undertaken and feedback from consultation with supplier and mine.

### 3 Limitations

Your attention is drawn to the document titled –“Limitation Statement”, which is included in Appendix A of this report. The statements presented in that document are intended to inform a reader of the report about its proper use. There are important limitations as to who can use the report and how it can be used. It is important that a reader of the report understands and has realistic expectations about those matters. The Limitation Statement document does not alter the obligations WSP has under the contract between it and its client.

Mapai Transport Limited  
Date: 27/03/2024

  
Signature of Lead Auditor

# Appendix A

Limitations







# Limitation Statement

This Report is provided by WSP Australia Pty Limited (*WSP*) for Mapai Transport Limited (*Client*) in response to specific instructions from the Client and in accordance with WSP's proposal dated 19 June 2023 and agreement with the Client dated 26 June 2023 (*Agreement*).

## PERMITTED PURPOSE

This Report is provided by WSP for the purpose described in the Agreement and no responsibility is accepted by WSP for the use of the Report in whole or in part, for any other purpose (*Permitted Purpose*).

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