

Corrective Action Plan

Name of operation: MUR WY S.A.C. Lead Auditor: Bruno A. Pizzorni Dates of Audit: October 14-15 , 2020						
Transport Practice	Protocol question	Brief description of the deficiency(s)	Detail description of the corrective action required	Evidence required	Completion date	Comments
Transport Practice 1.1 Select cyanide transport routes to minimize the potential for accidents and releases.	1. Does the transporter implement a process or procedure for selecting transport routes that minimizes the potential for accidents and releases or the potential impacts of accidents and releases? If so, does the process or procedure consider: a) Population density b) Infrastructure (roadway, rail, port, runway, helipad) construction and condition c) Pitch and grade d) Prevalence and proximity of water bodies and fog	Prevalence of and fog conditions is not considered in the routes assessments	Include into the route assessment instructions the Code requirements: a) Population density b) Infrastructure (roadway, rail, port, runway, helipad) construction and condition c) Pitch and grade d) Prevalence and proximity of water bodies and fog	Routes assessments instructions listing the following Code requirements: a) Population density b) Infrastructure (roadway, rail, port, runway, helipad) construction and condition c) Pitch and grade d) Prevalence and proximity of water bodies and fog	06/02/2021	Responsible: Didier Najar
	4. Does the transporter document the measures taken to address risks identified with the selected routes?	The routes reports evaluations reviewed have the same control measures along all the documents	Document the specific control measures taken to address the particular risks identified along the routes.	Routes risk evaluations specifying the control measures appropriate for the risk identified.	29/01/2021	Responsible: Didier Najar
	5. Does the transporter seek input from communities, other stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures?	No records could be found to demonstrate the transporter has managed to seek input from communities and other stakeholders during the routes evaluations	Document, as far as possible, information and/or communications with the client, or with communities, or any proof that the transported interacted with other stakeholders or governmental agencies as necessary in the selection of routes and development of risk management measures.	Records to show that comments have been requested during routes assessments..	06/02/2021	Responsible: Didier Najar
	7. Has the transporter advised external responders, medical facilities and communities of their roles and/or mutual aid during an emergency response?	There was no evidence that the carrier has informed outside first responders, medical facilities and communities (if the case) about their roles and / or mutual aid during an emergency response	Maintain records documenting has informed at least, outside first responders and , medical facilities of their roles and/or mutual aid during an emergency response	Records documenting all these communications.	06/02/2021	Responsible: Didier Najar

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Transport Practice 1.3 Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.	2. Are there procedures to verify the adequacy of the equipment for the load it must bear?	The transporter did not showed evidence of inspections or testing the vehicles to identify signs of stress or overloading.	Mur Wy is required to keep inspections and maintenance records of its activities related to identify signs of stress or overloading of its vehicles	The transporter should gather evidence such as documentation of inspections in evaluating compliance with this provision	06/02/2021	Responsible: Didier Najjar
	3. Are there procedures in place to prevent overloading of the transport vehicle being used for handling cyanide (i.e., overloading a truck, ferry, barge, etc.)?	The transporter did not show support evidence to demonstrate that the procedure achieves this goal.	Mur Wy should have a procedure or flow sheet or similar to ensure they are controlling overloading of trucks	Document records to demonstrate how the transporter is preventing overloading of the trucks.	06/02/2021	Responsible: Didier Najjar
Transport Practice 1.4 Develop and implement a safety program for transport of cyanide	1. Are there procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging?	It was not found procedures to ensure that the cyanide is transported in a manner to ensure the integrity of the cargo.	The transporter should have handling and inspection procedures as necessary to ensure that the integrity of cyanide packaging is maintained during loading and shipment	Develop and implement instructions/ procedures necessary to ensure that the integrity of cyanide packaging is maintained during loading and shipment. Inspection records showing controls for the cargo.	06/02/2021	Responsible: Didier Najjar
Transport Practice 3.2 Designate appropriate response personnel and commit necessary resources for emergency response	1. Does the transporter provide emergency response training of appropriate personnel?	During interviews with personnel in the cyanide transport operation, not enough knowledge was shown on how to respond to cyanide emergencies. No training records were found covering the recertification period.	Provide refreshment training to its personnel with designated responsibility for responding to emergencies during transport of cyanide. The training must address all planned response activities, such as asking for assistance, the use of personal protective equipment, first aid against cyanide exposure and measures to stop the flow of cyanide from the transport vehicle. The elements of this training must be documented in training materials, and records to be kept.	The elements of this training must be documented in training materials, and records to be kept.	06/02/2021	Responsible: Didier Najjar
	6. Are there procedures to inspect emergency response equipment and assure its availability when required?	No indications were found specifying inspections of emergency equipment.	Mur Wy is required to stablish guidelines for inspection of cyanide-related emergency equipment, including checklist	Provide guidelines for inspection of the emergency equipment. Provide inspections records	06/02/2021	Responsible: Didier Najjar

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			formats, frequency, and display records of inspections performed. Indicate who should do it, which you should review and how often.	according the established frequency.		
Transport Practice 3.3 Develop procedures for internal and external emergency notification and reporting	2. Are systems in place to ensure that internal and external emergency notification and reporting procedures are kept current?	No provisions were found on the need to keep notification information up-to-date	The Code requires provisions to be included on how and how often emergency contacts and procedures will be updated.	Provide provisions on how and how often emergency contacts and procedures will be updated.	06/02/2021	Responsible: Didier Najjar
Transport Practice 3.5 Incorporate into response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.	3. Is there a procedure to evaluate the Plan's performance after its implementation and revise it as needed, and have they been implemented?	In occasion of the audit, no procedures were found to review and evaluate it after any incident that results in its implementation	Mur Wy is required to include such provisions in the emergency planning.	Provide provisions in the emergency planning procedure to evaluate the Plan's performance after its implementation and revise it as needed.	06/02/2021	Responsible: Didier Najjar