

SUMMARY AUDIT REPORT

For The

International Cyanide Management Code

MUR WY S.A.C.

Transport Operation -Lima, Perú

October 2020



SUMMARY AUDIT REPORT

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SUMMARY AUDIT REPORT

Name of Cyanide Transportation Facility: Mur Wy S.A.C.
Name of Facility Owner: ARUNTANI
Name of Facility Operator: Mur Wy S.A.C.
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Location detail and description of operation:

Mur Wy S.A.C. (formerly Ajani S.A.C.), is a Peruvian company part of the Aruntani Group. Founded in 2000 with headquarters in Lima, currently employs around 1,500 employees (to 2020). Mur Wy is a trucking company dedicated to providing transport services to the mining industry, among others. Services include logistics, transportation engineering, transport of general cargo, chemicals, oversized cargo, bulk transport and hazardous materials. Mur Wy has a fleet of around 200 units in service with cargo capacity of 2,400 tons.

Mur Wy's transports solid sodium cyanide in 20 foot maritime containers from the Callao port or from a third party warehouse, to the mining clients nationwide. The company was first ICMI certified in 2013 and then recertified in 2017.

Mur Wy S.A.C.

Name of Facility



Sign of Lead Auditor

October 15, 2020

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Auditor's Finding

This operation is

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

This operation has maintained substantial compliance with the International Cyanide Management Code throughout the previous three-year audit cycle.

The Standards of Practice that were found in substantial compliance are:

- Transport Practice 1.1 - Select cyanide transport routes to minimize the potential for accidents and releases.
- 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.
- Transport Practice 1.4 - Develop and implement a safety program for transport of cyanide.
- Transport Practice 3.2 - Designate appropriate response personnel and commit necessary resources for emergency response.
- Transport Practice 3.3 - Develop procedures for internal and external emergency notification and reporting.
- Transport Practice 3.5 - Incorporate into response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.

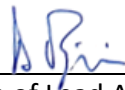
The deficiencies do not represent an immediate or substantial risk to health, safety, or the environment.

During the previous three-year audit cycle, this operation did not experience significant cyanide incidents requiring notification to ICMI and/or cyanide exposures or releases.

The Corrective Action Plan to bring this operation in substantial compliance into full compliance is enclosed with this Summary Audit Report. The plan must be fully implemented within one year of the date of this audit.

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Sign of Lead Auditor

October 15, 2020

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Audit Company:	BP Cyanide Auditors SAC
Audit Team Leader Email:	Bruno Pizzorni bpizzorni@cyanideauditor.com
Names and Signatures of Other Auditors:	María del Pilar Arrese 
Dates of Audit:	October 14 - 15, 2020

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

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

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Verification Protocol

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.

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

Mur Wy S.A.C. (Mur Wy) has a procedure to select and evaluate transportation routes that minimize the potential for accidents and escapes or the potential impacts of accidents and escapes. Assessments are conducted by the Convoy Lead Supervisor.

During the audit, it was found the routes evaluation were not updated and did not consider the topics required in this Protocol Question as, prevalence and proximity of water bodies and fog, in addition to any other that could affect the relative risks of the various routes being evaluated, such as natural hazards (volcanic activity, landslides, floods, etc.) and safety issues.

After the audit, although Mur Wy made great effort to update its routes assessment sending updated routes report evaluations for Apumayo and Anama mines, where they considered the requirements of this Transport Practice as population density, road infrastructure, construction and condition, pitch and grade and proximity of water bodies. Nevertheless prevalence of fog conditions was not considered, a hazardous condition very frequent in our national routes.

After another review of its route assessments, Mur Wy included the fog variable as requested by the Code.

The auditors found this Transport Practice in Substantial Compliance with the Code requirements. Mur Wy is require including into the route assessment instructions, the necessity to evaluate the requirements of the Code, listing them from a) to d) as indicated in this Protocol Question. Please refer to the Corrective Action Plan (CAP) for details.

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The carrier has implemented a procedure to assess the risks of the selected cyanide transport routes and takes the necessary measures to manage these risks. This assessment is documented in the roadmap assessments. The evaluations involve those in charge of transportation in the Organization: the Transport Chief, the Convoy Leader or whoever appoints the General Manager.

The transporter gets feedback on route conditions from the drivers and the Convoy Leader by mean of their WhatsApp group where any novelty in the road is communicated and shared with all transport operators.

Nevertheless, in occasion of the audit it was found the transporters had not implemented their procedure to periodically reevaluate routes. There was no evidence of updating the roadmaps during the recertification period. The procedure "Land Transport Route Control" establishes that the evaluation and approval of the roadmap will be done annually or when the conditions of the route change, a new product is transported, modifications of the route and its conditions are made due to weather effects, events / accidents of third parties or own, or as result of drills. After the audit the transporter submitted updated route assessments, finding the auditor this Protocol Question in compliance with the Code requirements.

On the routes reports evaluations dated November 5, 2020 for Apumayo and Anama mines it is noted that practically all the control measures applied for each situation are the same along all the documents.

Mur Wy is required to document the specific control measures taken to address the particular risks identified along the routes. Please refer to the CAP.

No evidence was found regarding the transporter had seek input from communities, other stakeholders and applicable governmental agencies, although the carrier informed that evaluates the route which has been previously reviewed with the customer and is according to local regulations. However, no records could be found that show that Mur Wy has asked for comments or had interaction of his kind.

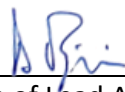
Mur Wy is required to document, as far as possible, information and/or communications with the client or with communities, or any proof that the transported interacted with other stakeholders or governmental agencies as necessary in the selection of routes and development of risk management measures. Please refer to the CAP.

The carrier uses convoys, with a pickup vehicle as an escort where routes present special safety or security concerns, and also as required by local regulations. The convoy may require one or more vehicles as an escort at the client's request; all this according to its Contingency Plan Sodium Cyanide Land Transport.

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.

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Mur Wy is required to maintain records documenting has informed at least, outside first responders and medical facilities of their roles and/or mutual aid during an emergency response. Please refer to the CAP.

Mur Wy does not subcontract any of the cyanide handling or transport services, it only uses its own vehicles and drivers.

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 Transport Practice 1.2
 in substantial compliance with
 not in compliance with

Mur Wy uses only trained, qualified and licensed operators to operate its transport vehicles. The company maintains documents demonstrating his drivers are qualified and have received adequate operational and safety training. Records were available for all current cyanide drivers to demonstrate that qualification and training requirements were met.

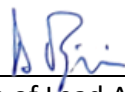
Valid driver's licenses were verified, both for supervisors and drivers. For drivers the profile "Driver of Semitrailer II" is established, which requires four years' experience as a road driver, which was in accordance with the revised work certificates of drivers. Training in Defensive Management was evidenced for the recertification period by an external contractor.

Interviews with supervisors, drivers, dispatch, administration and maintenance personnel, as well as training records confirmed that all personnel operating the cyanide transport equipment are trained to perform their jobs safely and properly. Training related to cyanide and cyanide management is provided. E-training records covering the recertification period were also available for review.

The auditor reviewed training records in dangerous materials warning, training of emergency brigades, first aids, evacuation and rescue, hazardous materials I and II, defensive driving, use and management of fire extinguishers, training in fatigue and drowsiness and training in the contingency plan for land transport of hazardous materials, among other.

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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.

The operation is

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

Mur Wy vehicles are appropriated and maintained to operate within the loads to handle. They use trucks with enough power to climb the Andes mountain range. Each vehicle transports one 20-foot intermodal sea container. The carrier works closely with its drivers to ensure that all equipment is suitable for the transport of cyanide. They use trailer loading checklists to ensure that trailers are suitable for transportation prior to loading any cargo and to ensure that loads are evenly loaded as well as blocked and braced.

Fleet specification files were available for review during the audit. The tractors and trailers were found to be capable of carrying the loads for which they were being used. Tractor and loaded trailer weights are carefully monitored to ensure that trucks are not overweight. The transporter has a formal preventive maintenance program to ensure that its tractors and trailers are safe for transport.

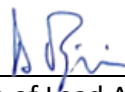
Mur Wy's procedure Cyanide Transport Management, states the required controls to assign the adequate vehicle, which starts when the cargo giver issues a record of weights and measures; the operator compares the load to receive against the official document "Table of Weights and Measures" issued by the Ministry of Transport and Communications, assigning according to this table and to the vehicle maintenance compliance, the appropriate vehicle to remove load. This procedure is managed through an Excel spreadsheet. It is the responsibility of the Operations Coordinator to assign the appropriate vehicles for the required service. The Transport Supervisor and the drivers are responsible to inspect the cargo and the transport units.

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. Corrective actions and support evidence requirements are detailed in the Corrective Action Plan (CAP).

Mur Wy transport standard cargos of cyanide in sea containers which is around 22 tons. To prevent overloading the vehicles, the transporter uses the "Table of Weights and Measures" indicating the

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maximum load aloud for each vehicle configuration, which for the case of cyanide transport is 43 tons. The procedure Cyanide Transport Management states only one 20-foot sea container can be loaded on a truck-semitrailer. The transporter retains records of this training.

Although the auditor interviewed the drivers confirming the procedure has been implemented, the transporter did not show support evidence to demonstrate that the procedure achieves this goal, as checklist registers. The corrective actions and support evidence requirements are detailed in the CAP.

Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

The operation is in full compliance with Transport Practice 1.4
 in substantial compliance with
 not in compliance with

As per interviews with the drivers, the auditor confirmed inspections to the cargo are performed as a good practice as not found this as a requirement in a procedure or other document.

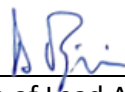
The transporter should have handling and inspection procedures as necessary to ensure that the integrity of cyanide packaging is maintained during loading and shipment. The corrective actions and support evidence requirements are detailed in the CAP.

Cyanide shipments are identified with the placards and signage required by the local jurisdictions through which it pass and as required by international standards. Cyanide shipments are identified with the placards required by national regulations and to meet International Marine Dangerous Goods (IMDG) Code labelling requirements. This labelling is posted on each side of the container and includes identification of solid sodium cyanide by UN number (#1689) and the skull and crossbones marker used for Class 6.1 toxic substances, along with the Marine Pollutant marker. The auditor inspected the placards and signage used to identify the presence of cyanide on transport vehicles verifying compliance with this provision.

The transporter's safety program address several controls for cyanide transport. The procedure Cyanide Transport Management address vehicle inspections prior to each departure, being responsible the maintenance area to inspect the vehicle before delivering it to the operations area, then the vehicle is subject to the driver's checklist and finally, the convoy is inspected by the convoy leader before departure.

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Any vehicle before being allowed to provide the transport service must have its preventive maintenance up to date, according to schedule, as stated by the Cyanide Transport Management. The maintenance area in coordination with the operations area, controls preventive maintenance in an Excel spreadsheet with traffic lights like warnings. Mur Wy manages a daily report of the transport units availability with weekly reports to the company's management about which and how many vehicles are available. The auditor reviewed the vehicles maintenance flowchart and maintenance records. All vehicles returning from a trip has a checklist to report any casualties regarding the trip and the vehicle.

Limitations on drivers' hours is required in the procedure Ground Transportation Route Control in Section Driving Times. It states the provisions of the local transportation regulations regarding interprovincial freight transportation must be complied. The roadmap must be started the day before considering the driver's rest before the trip. Feeding schedules should be considered. The Cyanide Transport Management procedure states drivers must perform technical stops every two hours for active breaks.

To prevent loads from shifting, the procedure Cyanide Transport Management requires the stowage and lashing of the cargo to be carried out according to the procedures Stowage and Lashing. The vehicles and the goods to be transported are visually inspected by the person in charge of the service before starting the journey to their destination, checking in particular the state of the lashing and the packaging.

Procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered, are described in the procedure Ground Transportation Route Control.

Mur Wy has a drug abuse prevention program and keeps records documenting that the above activities have been conducted. Before each trip drivers must pass through the company's medical area where they are evaluated for sense of balance and are subject to questions to evaluate tiredness.

The auditor considers the program reasonably addresses each identified issue as necessary to ensure the safe transport of cyanide and considering the specific circumstances presented by the transport route.

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Transport Practice 1.5:

Follow international standards for transportation of cyanide by sea and air.

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

Mur Wy do not ship cyanide by sea or by air. This section of the ICMC does not apply to the operation.

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

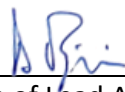
All truck drivers and personnel involved in the cyanide transport operation are provided with cell phones and an Emergency Contact List to communicate with Mur Wy and the client. The transport operators have a communication group via WhatsApp application where any novelty or alert in the operation is reported.

All trucks are equipped with VHF receiver transmitter radios and if needed convoys are provided with satellite phones to cover areas without cellphone and radio signal coverage. GPS that allows Mur Wy to track their units at all times since loading operations, on route and on arrival to the mine site. When a cyanide cargo is on road, the client receives periodically emails about the cargo location. The auditor reviewed the GPS installation reports and maintenance from the GPS providers.

According to Mur Wy procedures, all communication equipment will be confirmed to be operational at the start of each trip. Personnel from the Monitoring Central ensures that the truck has a working GPS checking if it emits to much alerts or if is not transmitting its position. Interviews were conducted to confirm that these practices are in place. Mur Wy communication system is part of the pre-work inspections and is maintained along with the formal preventive maintenance program. The system is used each day and correct operation of the system is confirmed at that time.

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Communication blackout areas along the transport routes have been identified during the routes risk assessments. On approaching to these areas, the convoy leader communicates its position to the Monitoring Central. Trucks are continuously monitored along the route in real time, and any delay will be immediately noticed at the Monitoring Central. The auditor reviewed trip records and interviewed drivers and operators from the Monitoring Central, confirming that this procedure is implemented.

Mur Wy tracks the progress of cyanide shipments through telephone communications and GPS system. The procedure Cyanide Transport Management requires periodic contact by mobile phone (WhatsApp) and through the use of global positioning systems.

GPS services allow fleet operators access to information about their vehicles and drivers, with a host of features, tools and reports. The GPS system automatically sends reports by email 4 times a day, as set now, to Mur Wy and the client. The convoy leader must report from checkpoints along the route. The auditor confirmed the implementation of these procedures by interview with drivers, operators of the Monitoring Central and through inspections of trip records.

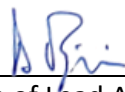
Mur Wy has systems in place to ensure that loads of cyanide arrive at their destination intact. A waybill accompanies the transportation which includes chain of custody data such as container numbers, the amount of cyanide delivered, waybill numbers, shipping documentation, Material Safety Data Sheet (MSDS), packing list, customs declarations and producer invoice. The container number and seal numbers are checked against the documents and signed by the cargo dispatcher and the driver. The cyanide shipment is carefully monitored by the driver and remotely through the transporter headquarters office.

Shipments with overnight stops require pre-established safety places where vehicles can be parked safely. At the continuation of the trip the next day, the drivers and the convoy leader check the integrity of the container's locks on doors, as required in the procedure for cyanide transport. On arrival to the mining sites security guards check the seal integrity and container and seal numbers against shipping documents as the containers enter the compound.

All shipments of cyanide are accompanied by shipping papers including the amount of cyanide in the load and by the Material Safety Data Sheets that identify the presence of cyanide and that describe the necessary handling precautions. Mur Wy procedure for cyanide transportation requires that this information be available. The auditor confirmed its implementation by inspecting the shipping papers which clearly indicate the number of packages and amount of cyanide transported and interviewing the drivers.

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2. INTERIM STORAGE

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

Transport Practice 2.1

Store cyanide in a manner that minimizes the potential for accidental

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

Mur Wy does not operate cyanide trans-shipping depots or interim storage sites in its transport operation. If a delivery is interrupted, loaded cyanide trucks would be stored in a secure location. The scope of this audit is for the ground transportation operations performed by Mur Wy trucks from Callao to mining clients within Peru without any interim storage. Therefore, this Transport Practice does not apply to the operation.

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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.

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

Mur Wy has the Emergency Response Plan for Sodium Cyanide Terrestrial Transportation (Emergency Response Plan or ERP) developed after the audit, as the auditor found that Mur Wy’s current Emergency Response Plan addressed very general response actions against accidents with hazardous materials, including cyanide. Mur Wy was required to identify cyanide risk scenarios and develop specific responses to emergencies due to spills and generation of HCN gas.

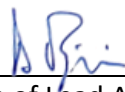
After the audit, Mur Wy submitted the new ERP which details responsibilities, communications procedures, updated notification numbers for emergency responders and actions to take against different cyanide emergency scenarios as spills and exposures, among others. Once the transporter proceeded to communicate this Emergency Response Plan to its personnel and presented the training attendance records to the auditor, no additional information was required by the auditor to find this protocol question in full compliance with the Code.

The Plan is appropriate for the selected transportation routes. It addresses specific emergency circumstances that could arise during cyanide transportation. The document considers specific response actions for emergencies that could arise during cyanide transportation between Callao to the mining clients. The Plan was found to be appropriate for this solid sodium cyanide transport operation.

The Plan considers the physical and chemical form of the cyanide. The only form of cyanide to be shipped is solid sodium cyanide. Emergency response procedures address actions to be taken in response to a solid sodium cyanide spill. The Plan includes the sodium cyanide MSDS where is defined the physical and chemical form of cyanide: solid white granular cyanide and specific information regarding the hazardous material to be transported.

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Mur Wy's Plan considers transport by trucks configuration tractor-semitrailer carrying one 20 feet intermodal sea containers. The emergency response actions in the emergency plans are appropriate for this type of product and method of transportation.

The actual current Plan considers all parts of the transport infrastructures including conditions of the roads (highway, secondary and mine roads) and urban areas. The Plan considers existing water courses, bridges conditions and danger of landslides on the route, among others. The plans address the emergency response to events that could occur in relation to these risks and hazards.

The Plan considers the design of the transport vehicle. The document defines the appropriate trucks and chassis to use to transport cyanide. It states that must follow local regulation and that trailers must be of conventional type or of "low bed" (low profile) type. The description indicates cyanide will be transported in 20 feet sea containers.

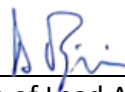
Mur Wy's emergency response plan include descriptions of response actions for cyanide exposure incidents, such as first aid and medical assistance, as appropriate for the anticipated emergency situation during transportation. It includes detailed response actions for each case, including spills in both current and standing open water bodies and for the other risks identified on the routes. The Plan consider a series of instructions covering the potential hazards that could occur during the loading, transportation and unloading of the cyanide cargo. It includes emergency response actions against collision or rollover, spillage of dry cargo to water sources, on the road and landslides.

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

The Plan establishes the role of outside responders and medical facilities in emergency response procedures. The police will provide support and safety isolating the area and will take control of traffic routes in case of an accident. In case of fire, the firefighters on arrival, will take control of the emergency, advised by the trucking company personnel regarding not using water on cyanide. In the event of accidents on the route, the Emergency Response Plan establishes that the Convoy Leader must call an ambulance for medical assistance to attend immediately the victims and to transfer them to the nearest hospital with adequate capability to attend the victims. The Plan includes a list of hospitals available en route.

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Transport Practice 3.2

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

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

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.

Mur Wy was asked to 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 corrective actions and support evidence requirements are detailed in the CAP.

The new version of the Emergency Response Plan describes specific responsibilities and duties of personnel during a cyanide transport accident or emergency. The roles and responsibilities of relevant internal and external personnel are described in the Plan.

During the audit it was found the current Plan had contradictions regarding leadership during emergencies response, also there were no responsibilities assigned to the convoy leader. After few revisions of the Plan, the auditor accepted the new version of the Plan where responsibilities were clearly defined and realistic assigned according to needed during an emergency during transportation. No additional information was required to find this Protocol Question in compliance with the Code.

Mur Wy included in the last version of the Emergency Response Plan a list of the emergency response equipment that must accompany the cyanide load along the transportation route. The list is within the Plan along with a verification check list to inventory equipment. The equipment was available for the auditor review including oxygen and Cyanokit among others.

In occasion of the audit, Mur Wy had an outdated list with cyanide antidotes not available. Mur Wy was required to update the list to reflect the existing emergency response equipment. After the audit, the

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transporter included into the Emergency Response Plan an updated list of the emergency response equipment which was found in compliance.

The equipment list indicated in the previous question confirms and documents that the necessary equipment is present for each shipment of cyanide. A checklist is used to verify that the emergency equipment it is available, and it is documented in the convoy report. The emergency kit must be inspected prior to every loading operation. The availability of this equipment was confirmed during the audit.

During the audit, training records were not enough to demonstrate that vehicle operators receive initial and periodic refresher training in emergency response procedures and implementation of the Emergency Response Plan. Mur Wy was required to show initial and periodic training records in cyanide in emergency response procedures.

After the audit, Mur Wy sent the auditor the training records of its vehicles operators, showing they receive initial and refresher training in emergency response procedures which includes implementation of the Emergency Response Plan. Documentation identifying the individuals trained and indicating the nature and dates of the training was available for the auditor's review. No additional information was required to find this Protocol Question in compliance with the Code requirements.

Although the auditor reviewed few inspection registers of the emergency response equipment, no indications were found specifying inspections of emergency equipment. Mur Wy is required to establish guidelines for inspection of cyanide-related emergency equipment, including checklist formats, frequency, and display records of inspections performed. Indicate who should do it, which you should review and how often. The corrective actions and support evidence requirements are detailed in the CAP.

Transport Practice 3.3

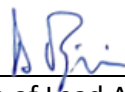
Designate appropriate personnel and commit necessary equipment and resources for emergency response.

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

During the audit it was found the procedures and contact information for notifying the stakeholders and outside response providers was outdated. After the audit Mur Wy sent the auditor the required information including updated notification procedures for notification of appropriate parties in the event of a cyanide release or exposure during transport. The notifications procedures and the telephone contact

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list are carried in the transport vehicle to be available as needed. The telephone list includes numbers for notifying regulatory agencies and potentially affected communities of an emergency. It lists current emergency numbers for local hospitals, ambulance, firefighters, police and environmental responders. No additional information was required to find this Protocol Question in compliance with the Code.

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. The corrective actions and support evidence requirements are detailed in the CAP.

Transport Practice 3.4

Develop procedures for internal and external emergency notification and reporting.

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

No specific procedures were found during the audit, related to recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris.

After the audit Mur Wy included in the Emergency Response Plan sanitation procedures to recover, neutralize and final disposal of contaminated debris and material, including who and how they would dispose the waste. The driver of the cyanide truck along with the escort personnel will provide the initial response to a transport related leak. If the spill is only a small amount of material or can be easily contained, they will be able to immediately clean up the spill and prevent further contamination.

Final cleanup of leaks that occur during transportation will be outsourced by a commercial chemical sanitation company identified in Mur Wy Emergency Response Plan, so it can be activated their action as soon as possible. All contaminated material and bags from the spill, will be sent to an authorized hazardous materials waste deposit for adequate final disposal. All contaminated clothes and EPP will be disposed by the contractor. No additional information was required to find this Protocol Question in compliance with the Code.

The Plan specifically prohibits using chemicals such as sodium hypochlorite, ferrous sulfate, and hydrogen peroxide to treat cyanide once it has entered surface water.

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Transport Practice 3.5

Incorporate into response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.

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

During the audit, no provisions were found for periodically reviewing and evaluating the Plan's adequacy, although Mur Wy's General Emergency Response Plan developed to comply with local regulations had been updated for compliance with authorities.

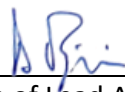
Mur Wy was required to develop and implement provisions to review and evaluate the adequacy's of the Plan. After the audit, the transporter included in the new version of its Emergency Response Plan (for cyanide related emergencies), the required provisions to update and periodically review the Plan. No additional information was required to find this Protocol Question in compliance with the Code.

Also, during the audit no provision were found in the exiting Plan, for periodically conducting mock emergency drills, although mock drills were done during the recertification period. After the audit, the transporter included in the new version of its Emergency Response Plan that mock emergency drills must be carried out at least once a year to keep the personnel permanently prepared for an emergency. No additional information was required to find this Protocol Question in compliance with the Code.

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. The corrective actions and support evidence requirements are detailed in the CAP.

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