



REPORT

International Cyanide Management Code Certification Audit

*Orica Australia Pty Ltd – Lytton Warehouse Facility (Toll Global Logistics) –
Production Facility ICMC Certification Audit – Summary Audit Report*

Submitted to:

**International Cyanide
Management Institute (ICMI)**

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PS131767-004-R-Rev2

December 2022

A large, solid red graphic element that starts as a thin line on the left and expands into a large, irregular shape on the right, resembling a stylized mountain or a large arrow pointing right. It occupies the bottom half of the page.

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APPENDICES

APPENDIX A Important Information

1.0 INTRODUCTION

1.1 Operational Information

| | |
|-------------------------------------|--|
| Name of Production Facility: | Lytton Warehouse Facility |
| Name of Facility Owner: | Toll Global Logistics |
| Name of Facility Operator: | Toll Global Logistics |
| Name of Responsible Manager: | Raghu Pathireddy, Lead warehouse and distribution |
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1.2 Description of Operations

1.2.1 Orica Australia Pty Ltd

Orica is an Australian-owned, publicly listed company with global operations. Orica is managed as discrete business units that produce a wide variety of products and services. The Mining Chemicals unit is based in Australia and exports products to Asia, Africa and the Americas, as well as supplying the local Australian industry. This unit's main product is sodium cyanide, which is manufactured at Orica's Yarwun Production Facility (Yarwun Facility) in Queensland, Australia.

1.2.2 Yarwun Production Facility

Orica's Yarwun Facility, which is located approximately 8 km by road from Gladstone, Queensland, commenced operations in 1989 and is engaged in the manufacture of cyanide (both solid and liquid forms), ammonium nitrate, nitric acid, chlorine, sodium hydroxide, sodium hypochlorite, hydrochloric acid and expanded polystyrene balls.

1.2.3 Toll Global Logistics Lytton Facility

Toll Global Logistics (TGL) is one of Australia's largest suppliers of outsourced logistics services to the chemical and plastics sector. TGL has a network of dangerous goods warehouses, operating in mainland capitals and selected regional centres with specialised warehousing and distribution capabilities.

The TGL Lytton Major Hazard Facility (MHF) at 19 Osprey Road, Lytton, is a dangerous goods warehousing and distribution facility. The primary function of the facility is the storage and handling of packaged and intermediate bulk chemical products in a two-compartment warehouse and in a number of external storage locations. A proportion of the products stored and handled on site are dangerous goods, with food grade materials and non-dangerous goods also being stored and handled on the site. Storage of goods on site is controlled by an electronic management system (PWMS).

The Lytton facility provides interim storage of cyanide under a contract arrangement for Orica. Shipping containers arriving at the facility from Orica's Yarwun Facility are only stored in an external area, designated for cyanide storage. Ad-hoc repacking of containers (i.e. moving intermediate bulk containers (IBCs) from one container to another) is undertaken when needed to enable onward transport. Otherwise, the cyanide product remains inside the containers for storage. No IBCs are stored outside of shipping containers.

There were no cyanide exposure incidents or releases recorded as occurring during the audit period.

1.3 Auditors Findings and Attestation

This is the initial certification assessment for the facility.

in full compliance with


Lytton Warehouse **The International**
Facility is: in substantial compliance with **Cyanide Management**
 not in compliance with **Code**

Audit Company: Golder Associates Pty Ltd

Audit Team Leader: Mike Woods (Exemplar Global - 113792)

Email: mike.woods@wsp.com

Name and Signatures of Auditors:

| Name | Position | Signature | Date |
|------------|---------------------------------------|--|------------------|
| Mike Woods | Lead Auditor and Technical Specialist |  | 14 December 2022 |

1.4 Dates of Audit

The warehouse (production) audit and reporting was undertaken between July and September 2022. The field component of the audit was undertaken on 13 and 14 June 2022.

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 Production Operations and using standard and accepted practices for health, safety and environmental audits.

2.0 PRINCIPLES

2.1 Principle 1 – Operations

Design, construct and operate cyanide production facilities to prevent release of cyanide.

2.1.1 Production Practice 1.1

Design and construct cyanide production facilities consistent with sound, accepted engineering practices and quality control/quality assurance procedures.

in full compliance with

The operation is

in substantial compliance with

Production Practice 1.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The facility is in FULL COMPLIANCE with Production Practice 1.1 requiring cyanide production facilities to be designed, constructed and operated to prevent releases of cyanide.

The Facility was built as a dedicated dangerous goods storage facility and construction was completed in 2002 and TGL lease the facility. Cyanide containers are stored externally on an unsealed hard stand area at the rear of the facility.

There are areas of subsidence around the outside of the facility and remedial actions are in place to reinstate the surface.

The facility is regulated under the Queensland *Work Health and Safety Regulations* as a major hazardous facility (MHF) and is subject to a *Licence to Operate a Major Hazard Facility*. The licence application process involves the submission of a Safety Case and inspection of the facility by the regulator.

The issuing of a *Licence to Operate a Major Hazard Facility* by the regulatory authority, which followed an assessment of the safety and reliability aspects of the design and construction of the facility, implies that the continued operation of the facility within established parameters will protect against cyanide releases and exposures.

The facility does not produce cyanide or directly handle cyanide product. The Facility is a container storage operation that removes IBCs from shipping containers on an ad-hoc basis where repacking of shipping containers is needed. Cyanide product (that remains within IBCs) is only temporarily re-positioned if required for the re-loading of a shipping container. All cyanide shipping containers are stored outdoors, and no storage of cyanide IBCs occurs outside of shipping containers.

The facility does not produce cyanide or directly handle cyanide product. The facility is a container storage facility and as such, the requirement for automatic systems or “interlocks” to shut down production systems and prevent releases due to power outages or equipment failures is not applicable.

Cyanide is stored within IBCs within containers that are placed on an unsealed hardstand area. The storage within containers is considered a management control to minimise seepage to the subsurface.

The facility does not produce cyanide or directly handle cyanide product. The facility is a container storage operation and as such, the requirement for methods to prevent the overfilling of cyanide process and storage vessels is not applicable.

The facility does not produce cyanide and does not have process and storage tanks or containers. As such, the secondary containment requirement for process and storage tanks and containers is not applicable.

Solid cyanide within shipping containers is stored on an external hardstand area. Repacking should it be needed is undertaken on a concrete surface in dry weather.

The facility does not produce cyanide or directly handle cyanide product. As such, the requirement for spill prevention or containment for cyanide solution pipelines is not applicable.

The facility stores cyanide in a manner that minimises the potential for exposure of cyanide to moisture, with adequate ventilation to prevent the build-up of hydrogen cyanide gas, in a secure area and separately from incompatible materials.

Cyanide is only stored outside, in a designated hardstand area located at the rear of the secure facility. Cyanide remains packaged within IBCs and these IBCs are stored inside shipping containers. IBCs may be temporarily handled if required for onward shipping – but this only occurs in dry weather and simply transfers an IBC from one shipping container to another. The facility is a MHF subject to a *Licence to Operate a Major Hazard Facility*. The licence application process involves the submission of a Safety Case and inspection of the facility by the regulator. Segregation of incompatible materials is a requirement of the MHF licence.

2.1.2 Production Practice 1.2

Develop and implement plans and procedures to operate cyanide production facilities in a manner that prevents accidental releases.

The operation is **in full compliance with** **Production Practice 1.2**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The facility is in FULL COMPLIANCE with Production Practice 1.2 requiring the development and implementation of plans and procedures to operate cyanide production facilities in a manner that prevents accidental releases.

The facility has developed formal procedures that describe the standard practices necessary for its safe and environmentally sound operation.

The facility is a MHF and there is a Safety Case that provides the basis for the safe operation of the facility. The facility has procedures for storage of shipping containers and for unpacking and loading of shipping containers, which may be necessary to facilitate onward transport. The facility does not handle raw materials or unpackaged cyanide.

Procedures include:

- Unpacking of containers
- Housekeeping and equipment inspections
- Personal protective equipment requirements
- Emergency response
- Management of change

Lytton Warehouse Facility
Name of Facility


Signature of Lead Auditor

16 December 2022
Date

The facility has developed formal procedures for contingencies during upsets in its activities that may result in cyanide exposures or releases.

The *Emergency Plan* does consider potential failure scenarios appropriate for its site-specific environmental and operating circumstances. The facility stores cyanide within intermediate bulk containers (IBCs) within shipping containers within a designated external storage area. At no time is the cyanide product handled or mixed at the site.

The *Emergency Plan* contains sufficient procedural information to allow these actions to be conducted and details persons responsible to undertake the actions.

There was an incident off site not related to the operation of this facility and while this did not occur onsite it did involve response by TGL and Orica to rectify the situation and enable return transport to Orica's production facility. The preparations were made on site to enable interim repairs to the shipping container in consultation with Orica and emergency services.

The facility has a procedure to identify when site operating practices have or will be changed from those on which the initial design and operating practices were predicated. The *Management of Change (MOC)* procedure outlines the assessment of change. The scope of the procedure covers:

...all proposed changes to compliance and process, plant equipment & building, human resources and new customers or products or any proposed change that will or may have impact upon health and safety, the environment, security or compliance to regulatory requirements, policy or procedure.

The flow chart within the procedure requires a risk assessment to be completed for safety and environment issues. Persons knowledgeable in safety and environmental aspects provide input into the risk assessment process.

One MOC relevant to cyanide storage was recently completed relating to increase in storage from 1000 tonnes to 2000 tonnes. A review of the risk assessment confirmed that the site's procedure had been followed.

The facility does not produce cyanide or directly handle cyanide product. The facility is a storage facility that primarily stores cyanide IBCs within shipping containers. Ad-hoc repacking is undertaken where necessary to facilitate onward transport.

Containers are moved and stacked using a container lifter (Combi lift SC) and forklifts are used for repacking operations. Accordingly, preventative maintenance programmes required under this question are only relevant for container lift and forklift operations.

Operators are required to conduct pre-operational checks on all lifting equipment each morning prior to use. The daily checks, along with engine hours are recorded on a weekly check sheet. Any deficiencies noted are required to be signed off as completed by the mechanic and the repair date also noted. Forklifts and combi lift are serviced by external mechanics as part of a preventative maintenance programme based on engine hours.

The facility does not produce cyanide or directly handle cyanide product. The requirement for monitoring process parameters with necessary instrumentation is not applicable.

Repacking operations are only undertaken during dry weather which minimises the risk of cyanide release and contamination of water. Solid product is stored in solid form within shipping containers within designated external areas. Release of cyanide into the drainage system could occur in the unlikely event of an incident

resulting in loss of containment during a sudden rain event and this scenario is addressed through the Emergency Plan and site operating procedures.

The facility has environmentally sound procedures for disposal of cyanide or cyanide-contaminated solids. Cyanide contaminated solids could be generated in the event of an incident. Clean-up and disposal processes are managed through operating procedures and the emergency plan in consultation with the manufacturer, Orica.

Cyanide contaminated solids are not generated as part of normal operations, however, if an incident were to occur, the emergency response team are responsible for the clean-up, site neutralisation and disposal of the potentially contaminated material, in accordance with the safety data sheets (SDS).

Procedures address the need for appropriate identification of hazards, containment of spills at the source, recovery of as much spilled material as possible and the clean-up of an impacted area (i.e. soil). There are designated hazardous material disposal bags and all equipment used in a clean-up is required to be decontaminated or disposed of in the hazardous material bags.

There are procedural arrangements to ensure that the cyanide produced by Orica is packaged and labelled as required by the political jurisdictions through which loads will pass. The packaging is undertaken at Orica's production facility in Yarwun and is not modified by TGL at the warehouse facility. The Orica production facility was re-certified under the Code on 17 September 2020.

If handling and repackaging of shipping containers is required, this does not impact the original product labelling (on IBCs). TGL will apply Dangerous Goods (DG) labels and United Nations (UN) numbers to shipping containers in accordance with the International Maritime Dangerous Goods (IMDG) code requirements should repacking be necessary.

2.1.3 Production Practice 1.3

Inspect cyanide production facilities to ensure their integrity and prevent accidental releases.

in full compliance with

The operation is

in substantial compliance with

Production Practice 1.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The facility is in FULL COMPLIANCE with Production Practice 1.3 requiring the inspection of cyanide production facilities to ensure their integrity and prevent accidental releases.

The facility does not produce cyanide or directly handle cyanide product.

The facility stores cyanide IBCs in their shipping containers and occasionally repacks shipping containers for onward transport. The operation does complete checks on containers prior to arrival and daily checks on storage areas. Containers are stored door to door to prevent unauthorised access.

The requirement for routine inspections of tanks holding cyanide solutions and pipelines, pumps and valves, pipelines and containments for structural integrity and signs of corrosion and leakage is not applicable.

Inspections for containers prior to acceptance into the facility are documented. Inspection checklists require the date, name of person conducting the inspection and the findings of the inspection to be captured.

Defects are reported to Orica for action. By reporting a serious defect to Orica, it is thereby documented. Correspondence regarding corrective actions and inspection records are retained. For the nature of the activities undertaken at the facility the inspection program in place are considered sufficient.

2.2 Principle 2 – Worker Safety

Protect workers' health and safety from exposure to cyanide

2.2.1 Production Practice 2.1

Develop and implement procedures to protect plant personnel from exposure to cyanide.

in full compliance with

The Transfer Facility is in substantial compliance with **Production Practice 2.1**
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The facility is in FULL COMPLIANCE with Production Practice 2.1 requiring the facility to develop and implement procedures to protect plant personnel from exposure to cyanide.

The facility has developed formal procedures to minimise worker exposure during product handling and repacking activities and emergency operations.

The facility is a MHF and there is a Safety Case that provides the basis for the safe operation of the facility. The facility has procedures for unpacking and loading shipping containers, which is the primary function of the facility. The facility does not handle raw materials or unpackaged cyanide.

Procedures include:

- Unpacking of containers
- Housekeeping and equipment inspections
- Personal protective equipment requirements
- Emergency response
- Management of change

Cyanide contaminated materials are not generated as part of normal operations, however, if an incident were to occur, the emergency response team are responsible for the clean-up, site neutralisation and disposal of the potentially contaminated material or equipment, in accordance with the safety data sheets (SDS).

Procedures address the need for appropriate identification of hazards in relation to a loss of containment or potential contamination of material or equipment.

The facility does not produce cyanide and there are no routine maintenance tasks, or equipment that require such tasks. It is only transport related equipment or machinery that may come into contact with cyanide or cyanide containing IBCs should an incident occur. Equipment used in the clean-up or neutralisation of a spill is decontaminated and or disposed of under the guidance of the emergency response team.

The facility does solicit and considers worker input in developing and evaluating health and safety procedures.

The facility has established a health and safety committee that meets monthly on site and there is a formalised agenda and minutes for this meeting that includes consideration of safety matters. The agenda for the meeting includes Management of Change, Training, Procedures and Audits.

The site also completes task observations and safety engagements where procedures and processes are discussed.

The facility does not produce cyanide or directly handle cyanide product. The Facility is a warehousing operation that stores cyanide product inside IBCs and within shipping containers in a secure and outdoor area. The Facility has developed and submitted a Safety Case to the regulator under major hazard legislation.

The facility does not utilise monitoring devices under normal conditions due to the nature of the tasks and conditions of storage for cyanide product. The facility does have a HCN gas meter available on site should HCN monitoring, or assessment be needed in the event of damaged packaging or emergency situation.

Portable gas detectors are setup to alarm at 5 ppm and 10 ppm. Personnel are required to leave an area if the monitor sounds. Only trained personnel are permitted to conduct the gas testing.

The facility utilises Orica's emergency response processes and documentation with regards to cyanide. This documentation states that should a situation arise whereby damage to a container results in a loss of containment, the area is to be secured and personnel are not to enter the area or shipping container. PPE and gas testing is required to determine the appropriate clean-up actions.

If HCN levels are > 10 ppm then self-contained breathing apparatus (SCBA) are required. < 10 ppm HCN requires ongoing monitoring within the container during clean-up activities.

The facility has the ability to store cyanide in IBCs within passively ventilated warehouses. Ventilation is provided via grated gaps at the base of the warehouse walls and "whirlybird" style roof vents.

The HCN monitoring equipment is maintained, tested and calibrated as directed by the manufacturer. Two HCN monitors are kept on site and bump tested weekly. The units are sent to Orica's production facility for calibration and replacement units are provided.

The facility has identified areas and activities where workers may be exposed to HCN gas or sodium cyanide dust and requires the use of personal protective equipment, as necessary, in these areas when these activities are being performed.

HCN monitoring equipment is only required when repacking containers or dealing with a minor spilt product or where it is suspected that the product/packaging may be wet. Alarms are set on the devices and the alarms are aligned with personnel actions. PPE needs to be worn should levels exceed 4.7 ppm which limits exposure below these levels. Personnel interviewed were aware of the actions to take should an alarm sound.

Calibration records for the last 12 months for the units recorded in the equipment register and observed on site are kept and were provided for review. The units were inspected, and calibrations were within date.

The operation has provisions to ensure that a buddy system is used, or workers can otherwise notify or communicate with other personnel for assistance, help or aid where deemed necessary.

The procedure for repacking designated two-person activity with one person acting as the spotter.

The facility does assess the health of employees to determine their fitness to perform their specified tasks. The facility has a pre-employment medical process to assess worker capability and check that they are medically fit to undertake the inherent requirements of their role.

The facility also has a drug and alcohol testing procedures for random, for cause on minimum of an annual basis using a third-party provider.

The facility does not require personnel to change clothing for accessing the cyanide storage areas. The warehousing or containerised storage of cyanide contained within IBCs does not present a risk to employees that require managing through a clothing change policy.

The Cyanide repacking instruction provides for the use of blue disposable coveralls for this activity.

Warning signs advising workers that cyanide is present and that, if necessary, suitable PPE must be worn, are located around the Facility.

Warning signs are attached to the cyanide containers and personnel are made aware of the location and hazards of cyanide through inductions and routine training.

The site is a designated MHF under Queensland legislation as it is a dangerous goods storage Facility. Personnel are prohibited from smoking, eating and drinking, and having open flames within the site, including external areas used to store Orica's cyanide product.

Signage is displayed at the main gate and at the access point to the site office to communicate these prohibitions. These messages are reinforced in the Site Induction and in the training materials for the various warehouses.

2.2.2 Production Practice 2.2

Develop and implement plans and procedures for rapid and effective response to cyanide exposure.

in full compliance with

The operation is

in substantial compliance with

Production Practice 2.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The facility is in FULL COMPLIANCE with Production Practice 2.2 requiring the development and implementation of plans and procedures for rapid and effective response to cyanide exposure.

The facility has developed specific written emergency response plans for cyanide exposures at the warehouse Facility.

The *Emergency Plan* for the site outlines the emergency management framework and includes basic instructions on responding to cyanide related incidents.

The operation has a pre-incident plan (PIP) that outlines response actions should there be a loss of containment with tiered response depending on the scale of the incident. Both the Emergency Plan and the PIP address the different mechanisms for exposure, including skin contact, inhalation and ingestion and provide first aid or first response information. The site also has Orica's Cyanide Emergency Response guide that details actions to take for different scenarios.

Showers, low-pressure eye wash stations and non-acidic fire extinguishers are located at strategic locations throughout the facility. They are maintained and inspected on a regular basis. The facility has a six-monthly preventative maintenance inspection and servicing programme. Safety showers were tested during the site visit and found to be on operational condition.

Dry powder fire extinguishers were observed throughout the facility. No carbon dioxide fire extinguishers were observed.

The facility has oxygen, a resuscitator, antidote and a means of communication or emergency notification readily available for use at the Facility.

Emergency showers and eye wash stations are located strategically throughout the Facility and a shower is located near the storage area and the containers are repacked in an area where two showers are available.

There is a site wide evacuation alarm and where the alarm sounds for longer than 20 seconds, personnel evacuate to one of the three designated muster points at the site. There is a site two-way radio system that is used in the event of an emergency.

There are two cyanide antidote kits (CYANOKIT Batch 2013-01 Expiry 24-June-2023). An oxygen resuscitator is stored in the First Aid room in the main office and is taken out to the work area when repacking activities are conducted.

The facility inspects its first aid equipment regularly to assure that it is available when needed. The first aid and emergency response equipment is stored and tested as directed by their manufacturer and replaced on a schedule that assures they will be effective when used.

The facility has developed a checklist that prompts the inspector to check the contents of kits on a regular basis. An inspection of the first aid equipment found the equipment listed to be present and in serviceable condition.

Safety data sheets (SDS) and first aid procedures on cyanide safety are in the language of the workforce (English) and are available to workers at the site. All the signs and procedures are in English, which is the official language. The IBC external packaging also provides information on cyanide hazards.

Cyanide is only present on site in solid form within IBCs within sea containers at the site. There are no tanks, pipes or other infrastructure that contains cyanide. Orica IBCs and containers are labelled in accordance with Australian Dangerous Goods (ADG) and International Maritime Dangerous Goods (IMDG) Codes, which identify and alert workers to the contents of the package.

As noted in 2.1, the facility provides warehousing and container storages services for solid sodium cyanide packaged in IBCs, accordingly there is not a clothing change policy or formalised decontamination procedure applicable for the site.

The repacking instruction provides for use of blue coveralls should repacking of IBCs into other container be necessary and details the process for using the disposable PPE.

Workers at the site complete the Orica Cyanide Awareness training that includes information and instruction on good hygiene practices when working around chemicals. Information is provided through the site induction process and includes the following guidance:

- Hands and face must be washed before eating, drinking or smoking and before using toilet facilities
- If you believe you have come in contact with cyanide, raise the alarm

- If you have been splashed with solution, get under safety shower and take off all clothing.

The facility has its own on-site capability to provide first response and immediate first aid treatment but is not capable of providing higher-level medical assistance to workers exposed to cyanide. The site has a number of trained first aid responders that are based at the facility and first aid equipment located at the main office.

Cyanide poisoning antidotes are stored onsite in the Transport Office and First Aid Room. These are only permitted to be issued by responding ambulance or medical personnel.

In the event that higher-level medical treatment is required, the casualty would be stabilised and transported to the nearest medical centre or hospital.

The facility has developed a procedure to transport exposed workers to locally qualified, off-site medical facilities.

The site has confirmed that the patient would need to be deemed decontaminated by Queensland Fire and Rescue before Queensland ambulance would transport the patient. The emergency procedures detail contacting Orica and Queensland Fire and Rescue in the event of a worker exposure.

In the event that transport of exposed workers is required to offsite medical facilities the transport would be undertaken by Queensland Ambulance Service (QAS). QAS provides services across the community and is linked to Australia's national 000 telephone emergency services phone number. QAS has clinical guidance for its paramedics in relation to cyanide exposure response.

The facility has alerted local hospitals, clinics, etc. of the potential need to treat patients for cyanide exposure, and the facility is confident that the medical provider has adequate, qualified staff, equipment and expertise to respond to cyanide exposures.

The operation has sought and received confirmation from the state health department on the capability of hospitals to treat a worker who may have been exposed to or poisoned by cyanide. The advice received was that:

“The majority of large tertiary Emergency Departments (EDs) will be able to manage a worker exposed or poisoned by cyanide. These departments will have local holdings of antidote (in small volumes) and an intensive care unit. Antidote volumes will be sufficient to manage 1-2 concurrent patients only. Medium to small EDs will not have this capacity and may need to transport antidote in or transfer patients out to larger hospitals with an intensive care unit.”

“The protocols for accepting a patient in the ED remains the same. An industrial exposure of cyanide will require a response from Queensland Fire and Emergency Services (QFES) which would most likely occur on site. All calls to QAS and QFES should clearly identify that there has been a worker exposed or poisoned by cyanide, and the number of potentially exposed workers.”

Procedures are in place to investigate and evaluate cyanide exposure incidents to determine if the operations programmes and procedures, to protect worker health and safety and to respond to cyanide exposures, are adequate or need to be revised.

The facility has a formalised incident reporting procedure. TGL has an Incident Management System, which is a computerised database for collection of incident related data.

2.3 Principle 3 – Monitoring

Conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.

2.3.1 Production Practice 3.1

Conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.

The operation is in full compliance with **Production Practice 3.1**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The facility is in FULL COMPLIANCE with Production Practice 3.1 requiring environmental monitoring to be conducted to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.

The facility does not have a direct discharge to surface water. Solid cyanide is stored within IBCs within sea containers and repacking activities, when needed, are conducted during dry weather.

The facility does not have an indirect discharge to surface water. Cyanide product is stored within IBCs within sealed sea containers providing suitable containment to prevent discharge to ground and therefore to surface water and indirectly to surface water. The facility does occasionally repack sea containers moving the IBCs from one container to another during dry weather conditions only. At no time are the IBCs opened.

The facility does not produce cyanide or directly handle cyanide product.

The facility occasionally removes IBCs from shipping containers and repacks into other shipping containers for onward transport. The facility has developed and submitted a Safety Case to the regulator under major hazard legislation and HCN generation was assessed in this process and was not considered a risk unless in the event of an incident. The facility does have HCN monitoring equipment in the event of damaged packaging or emergency situation.

The facility does not utilise monitoring devices under normal conditions due to the nature of the tasks and conditions of storage for cyanide products.

2.4 Principle 4 – Training

Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.

2.4.1 Production Practice 4.1

Train employees to operate the plant in a manner that minimises the potential for cyanide exposures and releases.

The operation is in full compliance with **Production Practice 4.1**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The facility is in FULL COMPLIANCE with Production Practice 4.1 requiring employees to be trained to operate the plant in a manner that minimises the potential for cyanide exposures and releases.

The facility trains workers to understand the hazards of cyanide and refresher training is periodically conducted.

The training material outlines the following topics:

- What is sodium cyanide?
- Cyanide exposure routes to the body
- Symptoms of cyanide poisoning
- First aid and medical treatment
- Safe handling procedures
- Summary/Discussion/Questions.

The awareness presentation concludes with a knowledge test that is used to assess comprehension of the training. This cyanide awareness course is incorporated into the Facility's training process, which also provides a three yearly refresher schedule for task and induction training.

The facility trains workers in the use of personal protective equipment (PPE) and when and where this equipment is required.

Site training materials introduce the items of personal protective equipment that are used at the Facility. These include:

- Basic PPE
 - Overalls or trousers and long-sleeved shirt
 - Steel capped safety footwear
 - Safety glasses with side protection
- Supplementary PPE
 - Gloves

Lytton Warehouse Facility
Name of Facility


Signature of Lead Auditor

16 December 2022
Date

- Protective suits
- Respiratory protective equipment
- Additional eye protection
- Self-Contained Breathing Apparatus (SCBA)

Practical training in the correct use of PPE is provided by the Health, Safety and Environment (HSE) Manager on the site.

Recent training records for personnel training were reviewed by the Auditor and training module attendance sheets included aspects on PPE.

Respiratory protection equipment is not normally used by the site other than MiniSCAPE and full-face respirators for emergency situations.

The facility trains workers to perform their normal production tasks with minimum risk to worker health and safety and in a manner that prevents unplanned cyanide releases.

The facility has a site induction programme that provides the overview of site safety rules and requirements.

To operate a forklift in Australia requires completion of a nationally recognised competency-based training programme, which TGL complies with. In addition, the site provides on-site training for the types of forklifts on site and workers need to be passed out on the use of the forklift prior to being allowed to use it. Workers are trained in the procedures for repacking shipping containers.

Employees are trained prior to allowing them to work with cyanide. As noted previously, the Facility has a site induction programme that provides the overview of site safety rules and requirements.

Workers complete peer to peer training for the repacking SOP prior to assessment and signoff.

The facility does not produce cyanide. Personnel are trained in how to safely complete their daily tasks and to understand the hazards of cyanide and refresher training is periodically conducted.

Training material outlines the following topics:

- What is sodium cyanide?
- Cyanide exposure routes to the body
- Symptoms of cyanide poisoning
- First aid and medical treatment
- Safe handling procedures
- Summary/Discussion/Questions.

The cyanide awareness course is incorporated into the Facility's training process, which also provides a three yearly refresher schedule for task and induction training.

The training elements necessary for each job are identified in training materials. The training elements necessary for the repacking of cyanide IBCs is covered through training for the operation of forklifts, which is part of nationally recognised industry certification, and through on-site procedures and cyanide awareness.

Appropriately qualified personnel provide the training. Induction training is provided by the HSE Manager who is familiar with the site operations and associated hazards.

Training on forklift operation and use is provided by nationally recognised training organisations in accordance with the Australian Qualifications framework. Organisations providing certified training meet training qualifications requirements.

Sodium cyanide training is provided through an online system and written questionnaire. This is supplemented by site rules and on the job training, which is provided by the site supervisors.

The Facility evaluates the effectiveness of cyanide training by testing. Evaluation questionnaires are used to evaluate the effectiveness of training, for example:

- Sodium Cyanide Safety Guidelines
- Repacking SOP

The documentation on which these evaluations have been based is filed in individual staff files. The evaluations are conducted in English, which is the official language.

2.4.2 Production Practice 4.2

Train employees to respond to cyanide exposures and releases.

in full compliance with

The operation is in substantial compliance with **Production Practice 4.2**

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The Facility is in FULL COMPLIANCE with Production Practice 4.2 requiring employees to be trained to respond to cyanide exposures and releases.

The facility does train workers in the procedures to be followed if a cyanide release is discovered. Generally, workers are trained to raise the alarm and notify their supervisor.

The site would only manage minor spill (up to 0.5 kg), the emergency management plan stipulates contacting Queensland Fire and Rescue, and this plan has been provided to them as part of the MHF regulatory process.

The facility does train workers to respond to worker exposure to cyanide and are routine drills used to test and improve their response skills.

The facility has developed pre-incident plans for cyanide that form part of the emergency planning process and have conducted mock drills in relation to chemical spills and site evacuation.

There site was also involved in the response actions from a damaged container at the Port of Brisbane that was coordinated by Orica.

Training records are retained throughout an individual's employment, documenting the training they have received and including the names of the employee and the trainer, the date of training, the topics covered, and how the employee demonstrated an understanding of the training materials.

Training files for workers were reviewed and contained evidence of training including course content, assessments and certificates. Where external training is conducted, certificates of attendance or attainment are retained on the individual's file.

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2.5 Principle 5 – Emergency Response

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

2.5.1 Production Practice 5.1

Prepare detailed emergency response plans for potential cyanide releases.

The operation is in full compliance with **Production Practice 5.1**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The Facility is in FULL COMPLIANCE with Production Practice 5.1 requiring a detailed emergency response plan for potential cyanide releases.

The facility has developed an *Emergency Plan* for the management of emergencies associated with the storage of chemicals including cyanide.

The facility is a designated MHF under Queensland legislation and is used for the storage and distribution of dangerous goods. The *Emergency Plan* has been developed to manage and mitigate emergencies likely to be encountered by the Major Incident Scenarios identified through the safety case for the site.

The *Emergency Plan* has been developed to facilitate the effective management of incidents involving:

- Chemicals, general freight and other goods which are in the control possession or ownership of the company and which are being handled, transferred, transported or stored
- Company personnel, subcontractors and the public
- Equipment and facilities in the control, possession or ownership of the company

In addition to the Emergency Response Plan which includes a pre-incident plan for solid sodium cyanide, the site has the *Orica Mining Chemicals Emergency Response Guide – Sodium Cyanide*. The purpose of this Guide is to provide guidance in the development of specific site & transport route emergency response plans for the management of incidents involving cyanide.

The *Emergency Plan* does consider the potential failure scenarios appropriate for its site-specific environmental and operating circumstances. As noted previously the site stores cyanide within IBCs within shipping containers in designated areas. Repacking of shipping containers is undertaken from time to time when needed. At no time is cyanide product handled or mixed at the site.

Potential scenarios are considered through the MHF assessment process and safety case. The *Emergency Plan Manual* considers applicable scenarios including:

- Catastrophic release of HCN gas
- Releases during loading
- Releases during fires and explosions

It includes instructions for:

- Emergency procedures for general loss of containment and fire
- Site evacuation
- Special procedures – cyanide fire and spills
- Toxic gas release
- Reporting of incidents and emergencies
- First aid
- Communication, investigation and recovery

The *Emergency Plan* contains sufficient procedural information to allow these actions to be conducted and details persons responsible to undertake the actions. The response actions are based on the storage of solid sodium cyanide in shipping containers in designated external storage locations and periodic repacking activities.

Additional response procedure information is contained within the *Orica Emergency Response Guide Sodium Cyanide*. Section 3.0 (Specific Emergency Response Guides) details additional specific response procedures for a variety of scenarios involving:

- Dry sodium cyanide spill – inside building/storage facility
- Dry sodium cyanide spill – outside building/storage facility
- Dry sodium cyanide spill – inside shipping container
- Shipping container decontamination
- Handling wet sodium cyanide
- Sodium cyanide spill to waterway
- Response to a fire in the vicinity of stored cyanide

The *Emergency Plan* does describe specific response actions, as appropriate for the anticipated emergency situations, such as evacuating site personnel and potentially affected communities from the area of exposure.

- Actions and responsibilities are outlined for:
 - ER Coordinator
 - Chief Warden
 - Wardens
 - ER Team Members

The *Emergency Plan* does consider the site in context of neighbouring facilities and the process for evacuating the site and notifying regulatory authorities of emergency situations.

The *Emergency Action Procedures* section provides directions for managing cyanide related spills and emergencies and general first aid response. The Facility has developed pre-incident plans for potential cyanide events that include first aid response.

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2.5.2 Production Practice 5.2

Involve site personnel and stakeholders in the planning process.

The operation is **in full compliance with** **Production Practice 5.2**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The facility is in FULL COMPLIANCE with Production Practice 5.2 requiring the Facility to involving site personnel and stakeholders in the planning process.

The facility has involved its workforce and stakeholders in the emergency response planning process.

Communities have not been directly consulted within regard to specific cyanide emergencies as no community or neighbouring business has been identified as likely to be affected (based on a review of potential releases from the facility and the distances involved). Furthermore, as the Facility is MHF, the Safety Case assessment by the regulator can be considered to satisfy consultation with the community.

Internal stakeholders have been involved in the emergency response planning process through initial document development, training exercises and periodic reviews of the *Emergency Plan*.

The facility has not made potentially affected communities aware of the nature of their risks associated with accidental cyanide releases as the scenarios identified at the site are unlikely to affect or require actions by the community. The facility is a MHF and there is a formal assessment of the Safety Case for the facility, which includes major incident scenarios and emergency response. The assessment of the Safety Case by the regulator on behalf of the community in the initial assessment of the facility can be considered consultation.

The most credible scenario of an incident at the Facility would involve dropping an IBC during a transfer or puncturing of container, resulting in a credible maximum spillage of approximately 1.1 tonnes of solid cyanide. The zone of influence of such a scenario is limited to the site and would not impact neighbouring properties. There is no residential land use in close proximity to the facility.

The facility has identified and involved local response agencies such as outside responders and medical facilities in the emergency planning and response process. External responders include Orica, medical facilities, Queensland Ambulance Service and Queensland Fire and Rescue.

The *Emergency Plan* includes call-out procedures and 24-hour contact information for the coordinators and ER team members. There is a 24 hour contact number and escalation process for contacting members of the incident management and emergency response team.

The Plan specifies the duties and responsibilities of the coordinators and team members. These internal and external stakeholders include:

- Person raising the alarm
- ER Coordinator
- ER Team Members
- Orica

- Port Security
- Queensland Ambulance Service
- Medical Facilities
- Queensland Fire and Rescue Service
- Police.

The plan also describes the role and interface with outside responders in emergency response procedures. These external responders include:

- Queensland Ambulance Service
- Medical Facilities
- Queensland Fire and Rescue Service
- Orica.

The facility has engaged in regular consultation and communication with stakeholders to assure that the plan addresses current conditions and risks. Orica are consulted with on response planning and regular consultation with internal stakeholders is undertaken via drills and debriefs.

The facility has also provided a copy of the Emergency Management Plan to Queensland Fire and Rescue and recently consulted with Queensland Health to confirm response capabilities at hospitals.

2.5.3 Production Practice 5.3

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

in full compliance with

The operation is in substantial compliance with **Production Practice 5.3**

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The facility is in FULL COMPLIANCE with Production Practice 5.3 requiring designated appropriate personnel and committed equipment and resources for emergency response.

The Emergency Plan does designate appropriate personnel and commit necessary equipment and resources.

The Responsibilities and Duties section designates primary and deputy emergency response (ER) coordinators with authority to commit the resources necessary to implement the Plan.

Wardens, First Aid Officers and the site ER Team Members are identified within the Plan. The plan does require training for personnel including:

- Selection and use of firefighting equipment
- Selection and use of PPE
- Procedures for dealing with chemical spills and fires
- Management of medical emergencies and

- Evacuation procedures.

The Emergency Plan includes call-out procedures and 24-hour contact information for the coordinators and ER team members. There is a 24 hour contact number and escalation process for contacting members for the incident management and emergency response team.

The Plan specifies the duties and responsibilities of the coordinators and team members. These internal and external stakeholders include:

- Person raising the alarm
- ER Coordinator
- ER Team Members
- Orica
- Port Security
- Queensland Ambulance Service
- Medical Facilities
- Queensland Fire and Rescue Service
- Police

The Emergency Response Personnel and Equipment section lists emergency response equipment that should be available. The Facility does have procedures and checklists to inspect emergency response equipment and assure its availability when required. A review of emergency response equipment during the site inspection found the listed equipment to be present and in serviceable condition.

The plan does describe the role and interface with outside responders in emergency response procedures. These external responders include:

- Queensland Ambulance Service
- Medical Facilities
- Queensland Fire and Rescue Service
- Orica

The operation has identified and involved local response agencies such as outside responders and medical facilities in the emergency planning and response process and includes them as necessary in mock drills or implementation exercises. External responders include Orica, medical facilities, Queensland Ambulance Service and Queensland Fire and Rescue.

As the facility is a MHF, the role of outside entities is mandated through the emergency response framework implemented by the government of Queensland. There is a formalised licensing process and regulatory oversight of the MHF, including for emergency response capabilities.

The site has confirmed the required attendance at site by Queensland Fire and Rescue in response to incidents involving spills >2 kg. Any loss of containment would also require notifying Orica who would provide technical support.

The most recent drill related to sodium cyanide included participation from Orica. Additionally, the site was used as a staging area to prepare damaged containers for transport back to the Yarwun facility. The containers were damaged at the Port of Brisbane and relocated to Toll Lytton as part of the incident response. Queensland Fire and Rescue were involved in the response process.

2.5.4 Production Practice 5.4

Develop procedures for internal and external emergency notification and reporting.

in full compliance with

The operation is in substantial compliance with **Production Practice 5.4**

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The facility is in FULL COMPLIANCE with Production Practice 5.4 requiring development of procedures for internal and external emergency notification and reporting.

The *Emergency Plan* does include procedures and contact information for notifying management, regulatory agencies, outside response providers and medical facilities of the emergency, as appropriate.

Emergency contact information is provided at the front of the document including contact details for:

- Toll 24 hour emergency response number
- Emergency Response Coordinator
- Deputy Emergency Response Coordinator
- Ambulance and medical centres
- Queensland state authorities

The *Incident Management and Corporate Notification* section outlines the process for:

- Contacting Toll Customised Solutions Emergency Response Centre
- Reporting emergencies internally
- Reporting to the Government authorities
- Notifying the emergency services

Contact information is contained within the relevant sections of the *Emergency Plan* and the Orica emergency response service 24 hour contact number is also provided.

The *Emergency Plan* does not include procedures and contact information for notifying potentially affected communities of incidents and/or response measures. As noted previously, cyanide related emergencies have been considered through the safety case process and offsite impacts scenarios have not been identified. The plan does have contact details for surrounding properties as other goods stored at the premises have potential for offsite impacts so this information is available if needed.

Responsibilities have been allocated within the *Emergency Plan* for communicating with the media. The *Emergency Plan* notes that it is the responsibility of authorised executive senior management to handle information releases, interviews and media visits.

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The facility does have a written procedure for notifying ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. The facility is a new storage facility for Orica and there have been no incidents at the site to report.

Should an incident occur at the facility, Orica would be notified and the Orica Cyanide Distribution Lead would assess the incident and notify the ICMI as needed.

2.5.5 Production Practice 5.5

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

in full compliance with

The operation is in substantial compliance with **Production Practice 5.5**
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The facility is in FULL COMPLIANCE with Production Practice 5.5 requiring the Facility to incorporate monitoring elements that account for the additional hazards of using cyanide treatment chemicals into response plans and remediation measures.

The *Emergency Plan* does describe specific, appropriate remediation measures, such as recovery or neutralisation of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris, and provision of an alternate drinking water supply, as appropriate.

The pre-incident plans outline the response actions including containment and clean-up. As noted previously, the facility stores cyanide within IBCs within sea containers and occasionally repacks sea containers on a sealed concrete surface. The repacking operation is undertaken during dry weather conditions, and this is taken into account in the emergency plan.

Should there be a loss of containment during transfer (e.g. fork tynes piercing an IBC) the solid product would be recovered from the concrete area using dust pans and brooms, placed into sealable plastic containers to return the product to Orica. Orica would be contacted through the 24 hour emergency line for technical advice and support for clean-up.

Minor quantities of hypochlorite (<20L) are stored within the admin building and would be applied in a 5% solution to the area after all visible cyanide product has been removed. This activity would be undertaken in consultation with Orica and Emergency services.

These procedures are supported by further detail in the *Orica Cyanide Emergency Response Guide*, Section 2.4 Decontamination of a Spill of Solid or Liquid Cyanide into Soil and Section 2.5 Use of Sodium Hypochlorite for Decontamination Purposes.

These procedures include descriptions on decontamination of soils or other contaminated media. Given the operation of the facility and location of cyanide on the site, contact of cyanide with soil or water is considered highly unlikely. Notwithstanding, the activities, infrastructure and procedural controls, the emergency procedures require the responder to notify the relevant parties listed in the Guide. Orica would be contacted to provide technical advice and information concerning the management of spill clean-up debris.

Provision of an alternative drinking water supply is not identified as being necessary as spills would be contained within the facility and the area supplied by a potable water scheme that would not be impacted by a cyanide emergency on site.

The *Emergency Plan* does prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water. This is not a credible scenario for the site, however the *Orica Emergency Response Guide – Sodium Cyanide*) specifically states that:

Sodium hypochlorite and ferrous sulphate must never be used to treat cyanide that has been released into natural surface water bodies. Both of these chemicals are toxic to aquatic life. Treatment with sodium hypochlorite can produce cyanogen chloride (CICN), which is hazardous to humans and aquatic life.

The *Emergency Plan* does address the potential need for environmental monitoring to identify the extent and effects of a release. Again, considering the location, infrastructure and activities at the site this is a high unlikely scenario. Orica would be contacted in the event of a loss of containment and the *Orica Cyanide Emergency Response Guide* addresses the potential need for environmental monitoring to identify the extent and effects of a release. Appendix 5 of the Orica Guide contains qualitative tests for of environmental monitoring, while Appendix 6 of the Orica Guide details the test methods for cyanide on surfaces, in water and soil.

2.5.6 Production Practice 5.6

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

in full compliance with

The operation is

in substantial compliance with

Production Practice 5.6

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The facility is in FULL COMPLIANCE with Production Practice 5.6 requiring the Facility to periodically evaluate response procedures and capabilities and revise them as needed.

The *Emergency Plan* does contain provisions for periodically reviewing and evaluating the plan's adequacy and they are being implemented.

The Emergency Plan is at revision 18 and is also part of the formalised review required under the facilities safety case. The operation has also conducted a number of mock drills as part of the review and evaluation process.

Mock emergency drills are conducted, and they are used as an effective part of the *Emergency Plan* evaluation process. Drill scenarios are varied and address both cyanide release and exposure type events. The mock exercises include a documented debrief report that outlines the scenario, performance of the response and evaluates what went well and what could be improved. The most recent drill related to sodium cyanide identified 5 improvement actions that are recorded and tracked through Toll's TRAC software system.

The Plan does contain provisions to evaluate and revise as necessary after any emergency that required its implementation. There has not been an emergency involving cyanide during the audit period. Despite this the plan has been reviewed and updated via the mock drill and debrief (response improvement) process.

3.0 IMPORTANT INFORMATION

Your attention is drawn to the document titled – “Important Information Relating to this Report”, 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 Important Information document does not alter the obligations Golder Associates has under the contract between it and its client.

Signature Page

Golder Associates Pty Ltd



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APPENDIX A

Important Information

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Where permitted by the Contract, Golder may have retained subconsultants affiliated with Golder to provide some or all of the Services. However, it is Golder which remains solely responsible for the Services and there is no legal recourse against any of Golder's affiliated companies or the employees, officers or directors of any of them.

By date, or revision, the Report supersedes any prior report or other document issued by Golder dealing with any matter that is addressed in the Report.

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