

# *INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE*

## *Transportation Summary Certification Audit Report*

BAKOU LOGISTICS  
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FROM 9 TO 14 - AUGUST 2021

Submitted to:  
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**SUMMARY AUDIT REPORT  
BAKOU LOGISTICS  
9 TO 14 AUGUST 2021**

Name of Operation:	BAKOU LOGISTICS
Name of Operation Owner:	BAKOU LOGISTICS
Name of Operation Operator:	BAKOU LOGISTICS
Name of Responsible Manager:	VIRIOT NINA
Cyanide co-ordinator	
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**Location detail and description of operation:**

BAKOU (BAKOU LOGISTICS Limited) is a Logistics, freight forwarding and transport Company Operating in Burkina .

The company was incorporated in 2004 and since then has served multinational companies with operations in Burkina .

BAKOU has the ISO 9001 certification and is authorized to transport hazardous materials, or any other cargo to mining and OIL & Gas industry .

The company is contracted as a cyanide transporter for CTA to transport solid cyanide (briquettes) by road from Tema port port to CTA Ouaga.

BAKOU Provides Customs Clearance and domestic trucking international trucking and freight forwarding services to their clients.

BAKOU has gradually expanded list of services over the years and developed an extensive network of contacts as they are the favourite transporter for TOAL petroleum.

This continuous progress has allowed them to be awarded with their first Major Contract for Domestic trucking since 2006

Bakou operation Cover all West Africa (Burkina-Faso, Mali, Niger, Senegal, Ivory Cost, Ghana, Togo, Guinée...), Bakou Logistics is active throughout West Africa.

Bakou Logistics ranks among the largest road haulers in Burkina in the bulk and volume transport markets.

With just under 200 employees, the company operates a modern fleet of 110 mainly new vehicles, in 8 loading countries and with 85,000 m2 of parking space.

The company strength lies in its combination of international standards and skills in both transportation and logistics, a highly developed West African network, advanced transport management systems and a sharp focus on quality and service.

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Cyanide is received at the port of Tema port by sea in containers, each of which hold 20 one-ton boxes of solid briquette cyanide.

The containers are offloaded at the ports by a stevedoring company.

A due diligence audit was done by ORICA, Samsung AGR as part of the ICMI audited supply chain of the cyanide producers and consignors bringing the cyanide into Burkina.

**SUMMARY AUDIT REPORT  
BAKOU LOGISTICS  
9 TO 14 AUGUST 2021**

For the purposes of Cyanide Code transportation compliance, BAKOU Burkina 's Code responsibilities commence on collection of the containers from the port.

The audit exclusively covers road transport from the port of Tema port to the CTA mining site.

Containers are delivered from the Quays to the port Container Depot where they are loaded directly onto trucks.

BAKOU Cyanide Code responsibilities commence once they take the containers from the port area.

BAKOU LOGISTICS clears the consignment and BAKOU vehicles collect the containers with the documentation and manage them under a Transport procedure (jointly agreed between the client , and BAKOU Burkina ).

The containers of cyanide, are then transported in escorted convoy by BAKOU and Ghana police in Ghana and Burkina gendarmerie officials in Burkina to client sites, Burkina government demanded that the applicant to transport the HAZMAT cargo must be done by the consignee . There is neither storage nor interim storage during the delivery journey.

Each truck has a driver, who is accompanied by a safety officer.

The safety officer manages the communications between the trucks, the escort vehicles and the convoy manager, and monitors the driver.

The convoy includes a convoy manager, safety officers, a cyanide first aider/ paramedic, a mechanic, cyanide emergency response equipment for spills and releases and cynokit or medical equipment to treat cyanide exposures (splashes, skin exposures, inhalations and ingestion).

The convoys include an customs escort through Burkina .

I. Note

I.2. BAKOU does not use any subcontractors. BAKOU undertakes the full road transport from the port of Tema port to client site.

I.3. BAKOU does not operate a temporary storage area.

Upon arrival of cyanide shipment cyanide, loaded onto trailers and conveyed without delay to client site.

If the carrier is not ready and present to collect the dangerous goods, then the cargo is segregated at Tema port await the carrier .

I.4. With regard to the BAKOU fleet, no cyanide incident or accident has been recorded, to date.

II. Auditees and interviewees:-

- 1-Traore Mamadou -Ceo
- 2-Viriot Nina - Cm
- 3-Sawadogo Aristide -Exploitation
- 4-Hien Kevin - Workshop Manger
- 5-Edjona Eklou - Maintenanancier
- 6-Maiga Boureima- Chef Planificateur
- 7-Balima Kadidiatou- Hsse Manager
- 8-Kabore Idrissa -Convoy Manger
- 9-Konate Drissa - Driver
- 10-Sana Issouf - Mechanic
- 11-Koita Check Mohamed - vulganizer
- 12-Traore Jean Louis-Escort Officer

Acronyms:

RA= Risk Assessment

ER= Emergency Response

HSSE= Health Safety security & Environment

SGS= Societe General De Surveilance

UMOEa= Union Economique et Monétaire Ouest Africaine

BIVAC= Bureau Veritas

HF= High Frequency

BL= Bill of Landing



**SUMMARY AUDIT REPORT  
BAKOU LOGISTICS  
9 TO 14 AUGUST 2021**

Auditor's Finding

This operation is

X in full compliance

in substantial compliance \*(see below)

not in compliance

with the International Cyanide Management Code.

Audit Company: Crown Transport & Logistics      Audit Team Leader: Ghassan Hussein

E-mail: [ghass@ctllwa.com](mailto:ghass@ctllwa.com)

Names and Signature of Transportation Auditor:

Name: Ghassan Hussein

Signature

Date: 26-8-2021

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.

Date of audit: 9-8-2021 TO 14-8-2021

Signed

Lead Auditor: Ghassan Hussein



Date: 26-8-2021

**SUMMARY AUDIT REPORT  
BAKOU LOGISTICS  
9 TO 14 AUGUST 2021**

**1. 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 **X in full compliance** with Transport Practice 1.1  
 in substantial compliance  
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Bakou developed road risk assessment and Journey plan has date of departure, where it is going, final destination, trip distance, loading and discharge order, truck number, remote number  
If they have a comment for change of route, condition and emergency numbers as well.  
TMP and journey plan provides details black out areas are identified and managed, route are selected.  
Also identifies rest point and rest points are audited as fit for purpose.  
Due diligence on the port operation is done by ORICA. Samsung AGR  
Moreover, evaluation of roads, surveys, route risk assessment and also an update on the road changing conditions.  
routes used for cyanide deliveries.  
Feedback on the route is received from drivers via journey plan.

The ERP and Transport Management Plan (TMP) require that routes are reassessed each month or more frequently if the season changes / requires.

During the convoy the Escort Commander provides real time risk management on the route condition.  
Feedback on the route is also documented in the End of journey plan produced by the Escort Commander following each voyage and clearly stated and elaborated in the journey plan.

This is used as an awareness tool for convoy personnel and discussed during the pre-trip briefing of the next convoy.

The feedback / journey plan document take into consideration everything from road conditions, to population, to time of transit, where delay came from and possible solution to expedite the delivery.  
The data from this sheet is transferred into the road risk assessment and analysis is done to review and revise the level of risk on the road and if the risk or the number of hazards is increasing or reducing.  
Convoy managers or escort takes this into account in their journey planning.

Route risk assessments are currently reviewed yearly and re done every 3 years.

All feedback is documented by Convoy Managers in the journey plan and transferred into the risk assessment during the yearly review.

Full routes are re-evaluated every five years although no alternative route is available

Road Survey and risk assessment is more of hazard identification and mitigation measures the identified hazard are, link to hazard map and updating the risk assessment. Population density, bridges, water bodies, black points, and black outs.

The Road Survey procedure identifies steps to be taken in the assessment of transport routes and identifies personnel responsible for undertaking each step.

the RRA addresses the rest points area, the risk in these areas, .

Which includes detailed route and rest stops and further identifies road hazards such as slippery roads, bridges, population densities, customs barriers, road construction, cyclists, traffic congestion, standard caution, heavy rain, cattle crossing, children, bridges etc.

the OBC / GPS id downloaded after every trip and analyze the road risk. Includes a sample of the road hazard mapping from Tema to Ouaga and Ouaga to Bobo. ,



**SUMMARY AUDIT REPORT  
BAKOU LOGISTICS  
9 TO 14 AUGUST 2021**

Road Risk Assessment Tema Ouaga is 1165 KM route considers the risks and the assessment of the risks as well.

Transport management plan ensures that the route has been analyzed in order to minimize the potential and impacts for accidents and releases.

Also ensures road risk assessment is used with infrastructure and condition is analyzed and controlled.

Each delivery is undertaken via convoy.

Bakou have also developed a list of authorized rest & stop points that can be used along transport routes.

The road risk assessment highlights areas of significant population density and the control measures needed to address the potential for accidents and releases or the potential impacts of accidents and releases.ment measures.

The survey team meet to discuss issues or concerns with the client and drivers.

On completion, copies of the RRA to client .

Prior to any voyage departure,

the ERP contains a list of contacts including the client that positive communication must be checked with any additional issues with the proposed route can be addressed at this stage.

- The community is consulted and involved limiting their role to crowd control . Bakou sent letter to all communities that they pass though their territories seeking cooperation and explaining the dangers of cyanide emphasizing the core responsibility of the community is not to get close or involved during an incident and not to use any ground or surface water until it is declared safe to do so by the authority. Furthermore, Bakou has a permit issued by the authority applied by the end user and paid by the end user to have gendarmerie escort.

Bakou has advised external responders and medical facilities as necessary of their roles and/or mutual aid during an emergency response.

Bakou ER contact list has been updated periodically external res-ponders are advised of their roles during an emergency response through letters and training coordinated by Bakou.

Police or gendarmerie undergo awareness before participating in convoys.

In the event of an emergency, they primarily provide protection functions which is not outside the scope of their normal roles.

External agencies including police, fireman, hospital etc.

are also involved with incident scenario training simulations at least once per year..

***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 **X in full compliance** with Transport Practice 1.2

in substantial compliance

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Bakou only enroll qualified and trainer personnel

All truck drivers have a permit D valid for 3 years that allows the driver to drive trucks above the weight of 19 tons and hold at least a Middle School Leaving Certificate and they should be able to read and write.

Bukina driving licence categories are

A= motobic

B= vehicle

C= 10 ton truck

D= Truck &Trailer



**SUMMARY AUDIT REPORT  
BAKOU LOGISTICS  
9 TO 14 AUGUST 2021**

E= Bus

F= Disabled

Training done are: First aid & firefighting, transportation of hazardous materials , cyanide transport , , defensive driving course.

Minimum training requirements have been established for cyanide drivers:

- First aid & fire fighting
- Training on cyanide awareness, and ER
- DDC

Transport management plan indicates that Bakou uses only trained, qualified and licensed operators... the training Matrix and the training plan shows the attendees matrix of the annual training done. An internal test is done as per procedure.

Drivers and Escort team have been trained to perform their jobs in a manner that minimizes the potential for cyanide releases and exposures.

This process is complemented with structured training.

Emergency simulations drill are carried out 2 times per year where specific aspects of the emergency plan are evaluated. at least 1 is for cyanide with external involvement.

Records of this training are kept for future reference.

The training matrix and records were reviewed to confirm training had scheduled and conducted.

The Health, Safety, Environment and Quality (HESQ) Manager explained that a structured process has been established for the training of new drivers.

The convoy carries all the necessary cyanide emergency equipment (cyanide releases and medical) with them and they are under armed customs escort.

***Transport Practice 1.3: Ensure that transport equipment is suitable for the cyanide shipment.***

The operation is **X in full compliance** with Transport Practice 1.3

- in substantial compliance
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

BAKOU only uses equipment designed and maintained to operate within the loads It will be handling when transporting cyanide .

Referencing procedures

Convoy management and cyanide handling procedures The TMP (transport management plan) states that the axle loads for trucks and trailers to be used that conform 11 ton the ECOWAS & UMOA treaty signed 1992 and 2006 respectively and the emergency response plan includes the calculation for determining whether the truck and trailer is appropriate for the load:

Prior to every convoy, equipment is checked using the Cyanide Equipment Checklist product based checklist, these include inspections of the king pins and twist locks.

Transport management plan indicates BAKOU uses only equipment designed to operate within the loads.

Drivers are paired with set trailer (20 foot) and truck.

All the equipment used for cyanide transport have a preventative maintenance plan that is recorded.

The work conducted on the vehicles is based on the preventative maintenance schedule (hours and kilometers) and a discussion between the mechanic and the vehicle driver (reactive maintenance). Work orders are raised for all work to be conducted.

The weight of cyanide briquettes in a 20 foot container is 20 tons. Only one container is carried on each trailer.



**SUMMARY AUDIT REPORT  
BAKOU LOGISTICS  
9 TO 14 AUGUST 2021**

The weight of the container is 2.3 tons and the weight of the trailer is 6 tons. The weight of the tractor is 8.3 tons.

Thus the Total weight of the truck ,trailer and load is 40 tons, including fuel.

The truck & trailer is a 5 axel vehicle (3 axles on the tractor and 3 on the trailer), thus the weight on each axle is based on 40 ton over 6 axel giving 8 tons per axle.

The BURKINA and ECOWAS maximum axle weight is 11 tons, meaning that the loading of axles is well within the maximum legal limits.

Specific truck and trailer maintenance records were sampled and checked.

Transport management plan indicates cyanide container are loaded on trailers.

cyanide is not **opened**, delivered in sealed containers as supplied by the manufacturer with same seals the containers are not opened at port and other form of delivery is done. No offloading or loading is done.

The container weights are detailed on the Bill of Lading prior to container collection from the Port of TEMA .

The containers are sea worthy with BIVAC inspection approval all containers comply with the IMDG regulations.

No sub-contracting is undertaken due to the nature of the cargo

***Transport Practice 1.4: Develop and implement a safety program for transport of cyanide.***

The operation is **X in full compliance** with Transport Practice 1.4

in substantial compliance

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

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

The TMP outlines that containers must be inspected prior to loading from port to ensure that all seals are intact and warning labels and registration numbers are in place.

Transport management plan 1-1-2021 indicates BAKOU procedure to ensure the cyanide integrity never compromised.

Also it outlines the containers must be inspected before loading in order to ensure that proper labels and seals are in place.

Container is not opened for loading or offloading so it stays intact till it reaches the site.

The Bill of Lading is stamped by the Port Authority indicating the containers have been delivered undamaged with the same seals installed by the producers.

The container is also checked by the client upon arrival, based on the delivery order signed.

The transport management plan , convoy management and the cyanide handling procedures explains how the transport is done with packaging consisting of plastic lined wooden boxes packed into 20 foot containers and sealed.

The integrity of the boxes and containers can only be compromised if they are damaged during handling or if moisture/water/liquids enter the containers or the boxes in case of an accident on road.

The container is sealed by the producer and only opened at the client.

**SUMMARY AUDIT REPORT  
BAKOU LOGISTICS  
9 TO 14 AUGUST 2021**

due to the nature of the cargo and the danger associated with it, the cargo is escorted by police in Ghana and gendarmerie in Burkina to ensure the cargo integrity and packing is never changed and the containers is never opened till destination.

the containers and vehicles undergo constant check ups to ensure there are no damages to cargo or the vehicle as well as preventative procedures to make sure BAKOU don't risk damaging cargo or company vehicles

Furthermore, a Container Interchange Report is completed and jointly signed by the shippers representatives and the cyanide transporter's representatives to agree on any damage that may be sighted on the container.

Also there is a checklist for the container integrity procedure, signed by the driver and the convoy manager and the mine upon delivery.

The Vehicle Trip Checklist is completed and signed at the mine confirming the condition, on delivery of the container and a section reports on container seals, labeling and general container condition.

This checklist is counter signed by the client representative confirming no irregularities on container, seal and vehicle checklist inspections are carried out when the convoy stops during the day and overnight done by the safety officer.

Placards are used to identify cyanide shipment, as required by international standards.

The ERP and TMP outlines the requirement for placarding to be placed on the 4 sides of the sea containers used in the transport of cyanide.

As a control measure, the cyanide is trucked in convoy under the escort of persons who have received training in cyanide emergency response and dangerous goods training. cyanide to have the following markings:

- Number UNO: 1689
- Principal class: 6 Poison
- Exact designation of the dispatched product: sodium cyanide , Solid.

The shipping container containing the IBC's is marked with Hazchem labels on all sides

all convoy have been appropriately planned with set breaks and designated overnight stops.

Convoys cannot travel between 18:00 and 06:00 without prior written permission and accompanying HSE measures in place.

Bakou has put a lot of emphasis on fatigue management

through administration policy define working hours for all staff based on their jobs, employment contract for staff has specifically defined the working hours for drivers and through convoy and cyanide management procedure define the working hours , driving hours , rest time rest are maximum 2.5 hours drive 30 minutes rest)

through Journey ,OBC and GPS download Bakou monitor every driver working and driving hours through the GPS and take action if any violation warning letters and other consequence management are implemented for violators

the fatigue management procedure explicitly state and define the availability , working , driving hours rest time and rest days also the consequence of 3 violation lead to a termination.

the TMP and drivers rules it also regulate the drivers returning the empty containers the fatigue regulation still applies.

the above policies and procedures summarized to the following

maximum hours of **availability** during any 24 hour period (12 hours);

maximum **driving** hours on duty in any 24 hour period (8 hours );

availability and driving hours must be between from 6 am to 6 pm

maximum period of continuous driving (2.5 hours) with 30 minutes break;



**SUMMARY AUDIT REPORT  
BAKOU LOGISTICS  
9 TO 14 AUGUST 2021**

minimum daily rest time 180 minutes  
availability is 12hrs /day  
maximum weekly driving hours (54),  
working week to be a maximum of 6 consecutive days.  
all the above are not implemented during Ramadan or the fasting month for Muslims  
during Ramadan the maximum working hours is 8 hours not 12  
the driving hours is 6 not 8 hours  
the maximum working hours per week is 40 not 54 hours  
maximum continuous driving period is 2 hours not 2.5 hours  
Bakou cyanide movement procedure addresses the following  
1-civil unrest in Ghana and burkina  
2-armed robbery  
3-bad weather  
the emergency response plan addresses the scenario of bad weather, civil unrest or armed presence on route or vandals  
it state for civil unrest in Ghana they park at the nearest police station and  
in Burkina they are sent tot he regional gendarmerie head quarters  
also emphasizes that if loading is not done and there is any risk the trip or convoy is suspended till further notice  
Bakou HSE policy commits to train staff on HSE matters, misuse of drugs and alcohol and preventative actions relating to drug and alcohol.  
The policy also notes that Bakou will carry out testing random and for cause on the use of drugs and alcohol  
in the event of a positive test , will result in actions including further preventative training.  
that the policy ensures that drugs and alcohol are controlled.  
There is a briefing before every trip on the use of alcohol and drugs that is prohibited.  
Policy prohibits drugs and alcohol on the company premises or whilst driving and the consequences of positive test results.  
The driver also signs acceptance of the positive results.  
The policy and company recognizes alcohol and drug dependence as a treatable condition and will provide appropriate support and assistance within the bounds of the policy.  
Records are maintained for relevant parts of this element to and to each finding.  
If the reading is positive, it is sent to the hospital to confirm the reading, if he is long time alcoholic or one off.  
Bakou has ISO 9001 Certificate, keeping records is mandatory for all its activities.

***Transport Practice 1.5: Follow international standards for transportation of cyanide by sea and air.***

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

Summarize the basis for this Finding/Deficiencies Identified:

Bakou does not transport consignments of cyanide by sea within the scope of this audit.



**SUMMARY AUDIT REPORT  
BAKOU LOGISTICS  
9 TO 14 AUGUST 2021**

N/A Bakou is not involved in managing sea or air shipments of cyanide, only land transport.

***Transport Practice 1.6: Track cyanide shipments to prevent losses during transport.***

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

Summarize the basis for this Finding/Deficiencies Identified:

Transport management plan indicates vehicles are equipped with GPS tracking monitored by Bakou .  
Vehicle tracking system

The drivers do not use the communications equipment.

The accompanying safety officer in each truck communicates with the convoy leader and support vehicles. and appropriate emergency res-ponders and emergency services on the convoy route and the client, based on the protocol of communication in ER plan and the customs document declare precisely the delivery documentation the container numbers, weights and seal numbers.

The convoy manager is obliged to call BAKOU every 60 minutes and to call the client at every rest point.

Where no reception exists, the convoy commander calls before and after the reception black spot.

VHF radio, headlights and horns are used to communicate incidents between vehicles in the same convoy.

Check list ensures that the OBC tracking is working properly.

Transport management plan indicates that communication equipment shall be reviewed and confirmed before convoy departure.

Communication equipment (GPS, mobile phone, radio,) is periodically tested to ensure it functions properly and is part of the check list.

Communication blackout areas are identified during the route assessment process and procedures are implemented to manage them.

GPS tracking is implemented for all convoys.

Convoys periodically call by phone every 60 minutes BAKOU head office.

The container weights are also detailed on the Bill of Lading .

A scanner is used at the Port to verify that the correct container has been placed on the selected trailer .  
BAKOU uses convoys as a means of managing the risks of road transportation, responding to emergencies and to prevent product loss.

The cyanide from the port of entry to destination is under the control and the responsibility of the authority due to the dangerous nature of the cargo

The delivery documentation notes the container numbers, weights and seal numbers.

The customs document declare precisely the delivery documentation the container numbers, weights and seal numbers. also the convoy manager carries along an MSDS for cyanide and a list of emergency contacts between the port and site.

The declared weight of the container is appearing on the delivery note.

BAKOU manages the supply custody using the TMP .

The cyanide from the port of entry to destination is under the control and the responsibility of the authority due to the dangerous nature of the cargo.



**SUMMARY AUDIT REPORT  
BAKOU LOGISTICS  
9 TO 14 AUGUST 2021**

**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 releases.*

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

Summarize the basis for this Finding/Deficiencies Identified:

N/A There are no situations where interim storage occurs since the cargo is under the authority custody and doesn't allow the cargo to park or be sent anywhere apart from the approved route.  
There is a procedure that prohibits eating or drinking near the cyanide ref# BK15-BK33-BK34-BK52

**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 **X in full compliance** with Transport Practice 3.1  
 in substantial compliance  
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

This information is contained within the procedure that emphasis on what to do during cyainde accident from first aid, neutralization and external res-ponders.  
This plan gets updated yearly, or when the ERP is activated, or in case of a drill feedback that needs to amended.

No interim storage but the plan covers different scenarios and different routes specified by the Ministry in BURKINA .

BAKOU control convoy using the convoy formation and reduced speeds (max 50 km / h) used along the transport route.

The procedure addresses the responsibility of the roles for convoy personnel.

As all cyanide deliveries are made in convoy, the accompanying Emergency Response Team will implement the Emergency Response Plan.

If more support is needed in which case they will report to head office or external res-ponders.

Physical and chemical forms of cyanide are described in the ERP and cyanide handling procedures

The ERP and TMP also details the steps to be taken to neutralize and clean up residual cyanide

The ERP and TMP consider the method of transport.

The documents were developed as an outcome of the route assessment process and consequently consider aspects of the transport infrastructure. The plan considers all aspects of road transport only since sea air and railway are not part of the scope.

The four emergency situations described in the ERP are based on prime mover and trailer configurations with 20 foot containers.



**SUMMARY AUDIT REPORT  
BAKOU LOGISTICS  
9 TO 14 AUGUST 2021**

The ERP includes descriptions of response actions, as appropriate for the anticipated emergency situation .

Bakou uses permit has been given from the authority to transport cyanide.

The client primarily provides logistical support in the event of an emergency (crane, security etc.) in case the incident is close to the his site.

The roles of the gendarmerie , Fire Brigade and Hospitals are in accordance with their duties.

External res-ponders were advised of their roles during an emergency response through letters and training coordinated by Bakou .

External agencies including gendarmerie , fireman, hospital etc are also involved with incident scenario training simulations at least once per year.

Community is informed and trained and consulted with all details not to get involved.

The possibility of using outside medical responders has been considered and a communication through letters and brochures .

***Transport Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response.***

The operation is **X in full compliance** with Transport Practice 3.2

in substantial compliance

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

BAKOU has developed a training matrix for transport personnel.

A training simulation involving external res-ponders is conducted at least once per year.

Transport management plan states the involvement and training of stake holders in case of emergency.

Critical task and critical position procedure indicates the training and competency needs of all jobs and includes emergency response.

Convoy team members are trained in emergency response.

There are descriptions of the roles and responsibilities in the ERP and TMP.

A flow diagram is included in the ERP that outlines the flow of information in the event of a cyanide incident during transport.

The ERP also outlines key commitments of the cyanide manufacturer.

ERP describes the emergency response duties and the personnel involved.

BAKOU has a checklist for emergency equipment that is available during transport or along the transportation route .

The procedure also states the equipment needed and available per convoy.

The equipment is checked per trip and monthly expiry and test are done per inspection.

BAKOU has a checklist for necessary emergency response and health and safety equipment including PPE that is checked before each convoy.

The convoy escort vehicles carry all the necessary emergency response equipment that may be required for cyanide emergencies during the convoy routing.

these can be seen in the procedures:equipment inventory and the checklist

BAKOU provides transport vehicle operators with initial and periodic refresher training in emergency response procedures.

BAKOU has developed a training matrix for all transport personnel.



**SUMMARY AUDIT REPORT  
BAKOU LOGISTICS  
9 TO 14 AUGUST 2021**

This matrix identifies the training needs for escort personnel and convoy drivers. Cyanide training is provided by BAKOU annually or more frequently if needed. A training simulation involving external responders is conducted at least once per year. Discussions with convoy personnel confirmed that they knew what their roles during an incident. Transport management plan indicates that the drivers must have received prior induction (refreshment) in order to know how to deal with emergencies. All members of the convoy team (escort vehicle and drivers and safety officers) are trained on the Emergency Response Plan. Pre-trip briefing includes refresher of emergency procedures. The convoy cannot leave unless all equipment is available and in appropriate condition. Convoy equipment is checked and tested before the convoy moves. The HCN detector is also tested and is sent to the manufacturer agent when due for calibration every 12 months. . No sub-contracting undertaken due to the nature of the cargo and the lack of safety standards by service providers. Bakou retain the full responsibility of their operation. The only operation that is subcontracted is the stevedore and this is covered by the due diligence done by supplier to client.

***Transport Practice 3.3: Develop procedures for internal and external emergency notification and reporting.***

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

Summarize the basis for this Finding/Deficiencies Identified:

The ERP and the manual of authority during emergency M.O. U POUR UR indicates the contacts that are relevant during an emergency with their appropriate work position. The ERP and associated documents contain procedures and current contact information for notifying the shipper, the receiver/consignee, outside response providers, and medical facilities of an emergency. A flow diagram is included in the ERP that outlines the conveying of information in the event of a cyanide incident during transport.

BAKOU has systems in place to ensure that internal and external emergency notification and reporting procedures are kept current. The ERP requires a review of the contacts list prior to the convoy departure.

***Transport Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.***

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

Summarize the basis for this Finding/Deficiencies Identified:



**SUMMARY AUDIT REPORT  
BAKOU LOGISTICS  
9 TO 14 AUGUST 2021**

BAKOU has procedure for remediation, such as recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris. Residual cyanide will be recovered and neutralize according to the procedures for neutralization which were established by the manufacturer. Treatment and or disposal of soils; reclamation of Sodium Cyanide; Transport of contaminated materials; Neutralization; and Water Resource Treatment. The ERP and TMP and cyanide handling procedures prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfite or hydrogen peroxide for the treatment of cyanide discharged to surface moving water. The ERP details the negative implications of using sodium hypochlorite, ferrous sulfate or hydrogen peroxide for the treatment of cyanide discharged to surface moving water.

***Transport Practice 3.5: Periodically evaluate response procedures and capabilities and revise them as needed.***

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

Summarize the basis for this Finding/Deficiencies Identified:

The HSSE system reviews all procedures include ERP every year and the management reviews were all recorded. Incidents are reviewed especially the emergency situation and strategic decision that are made. The internal audit evaluate the effectiveness of the system. The ERP requires a review of the contacts list prior to the convoy departure. This ensures that the list is kept up to date.

Emergency simulations are carried out twice per year where specific aspects of the emergency plan are evaluated.

A training simulation involving external res-ponders is conducted at least once per year. The drill done by BAKOU is in order to have the escort team to react effectively and professionally in the case of a cyanide incident on road. In addition the ERP contains a requirement that it is to be reviewed and Implemented .

No cyanide incidents have been reported to date. The ERP requires a review of the contacts list prior to the convoy departure. The ERP had one revision since its development.



LEAD AUDITOR  
GHASSAN HUSSEINI

