

# **SUMMARY AUDIT REPORT**

for the February 2022  
International Cyanide Management Code Certification Audit



**Prepared for:**

RSB Logistic Inc, Canada

**Submitted to:**

International Cyanide Management Institute  
1400 "I" Street NW, Suite 550  
Washington, D.C. 20005

**FINAL REPORT**

31 May 2022



1040 Chamberlain Drive  
North Vancouver, British Columbia, V7K 1N9, Canada

## SUMMARY AUDIT REPORT

**Name of Transporter:** RSB logistic Inc.

**Name of Owner:** RSB Logistic Inc.

**Name of Responsible** Mr George Eckel, President

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Canada

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### **Location detail and description of operation:**

RSB LOGISTIC INC (RSB). is the North American subsidiary of RSB LOGISTIC Projektspedition GmbH, located in Cologne, Germany; a part of the Kieserling Group located in Bremen, Germany. The Kieserling Group merged with Compass Ocean logistics to form Compass Logistics International AG, ultimately forming Customized Logistics Ideas AG, an international specialist, that provides logistics services for industries and trade for a wide range of business segments including contract logistics, pharma & healthcare, freight forwarding, military and project logistics.

RSB is headquartered in Saskatoon, Saskatchewan, Canada, and has been in operation since 1978. RSB's primary hazardous goods transport business is the shipment of radioactive materials from mines in northern Saskatchewan. Transport of sodium cyanide makes up only a small percentage (currently between 25 and 50 loads a year) of RSB's business.

RSB uses only dry-van trailers to transport cyanide in solid briquettes form packed in semi-bulk bag-in-box totes. The shipments originate in the United States and are bound for Canadian customers. RSB is only contracted to transport cyanide containers and is not responsible for loading, unloading or temporarily warehousing the product.

RSB currently ships sodium cyanide for Chemours Company FC, LLC (Chemours) between Chemours production plant in Tennessee (now owned by Draslovka Holdings a.s. (Draslovka)), and Brenntag Canada Inc., a chemical distribution company facility in Winnipeg, Manitoba, and for Univar Solutions Canada (Univar) between the Cyanco International LLC production plant in Alvin, Texas and the SSR Mining's Seabee Gold Operation (SGO) in Northern Saskatchewan.

Univar shipments only occur during the winter months as it involves use of an winter ice-road for the final leg of the journey.

RSB maintains an International Organization for Standardization (ISO) 9001:2005 certified Quality Management System (QMS), that provides an organizational structure, defines responsibilities, and establishes controls for implementing and managing procedures, processes, documentation, and resources. The current certification is valid until May 2023. RSB is also a Customs-Trade Partnership Against Terrorism / Partners in Protection (CTPAT/PIP) approved carrier, which places added security requirements on all components of cross-border transportation.

RSB has a secure compound at its Saskatoon address where, although not a regular practice, in transit cyanide loaded dry-van trailers are occasionally parked for short periods because of winter ice-road conditions. Such was the case during the site audit during which the transport of several loads of cyanide to the SGO in Northern Saskatchewan were delayed from being completed because irregular weather conditions impeded the opening of the winter ice-road to the mine.

# SUMMARY AUDIT REPORT

## *Auditors' Finding*

**The operation is:**                   ■ in full compliance  
  in substantial compliance  
  in compliance

**Audit Company:**                 **Lambert Environmental**  
  1040 Chamberlain Drive  
  North Vancouver, BC V7K 1N9

**Lead & Technical Auditor:**   John Lambert, EP(CEA)  
  ICMC Lead Auditor  
  e-mail: [john.lambert@telus.net](mailto:john.lambert@telus.net)

**Date(s) of Audit:** 23 February and 24 February 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 Transportation Verification Protocol* and using standard and accepted practices for health, safety and environmental audits.

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Signature of Lead Auditor

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# SUMMARY AUDIT REPORT

## **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.**

#### **■ in full compliance with Transport Practice 1.1**

The operation is  
in substantial compliance with  
not in compliance with

#### *Summarize the basis for this Findings/Deficiencies Identified:*

RSB has a process for selecting transport routes to minimize the potential for accidents and releases. Transport contracts are not accepted if they involve off-highway routes unsuitable for RSB's fleet of tractor trailers. For each accepted cyanide contract a *Routing Package* is prepared that includes a detailed route plan using Hazmat compliant routes established by applicable government agencies for specified classes of dangerous goods. These Hazmat compliant routes are based on various risk factors including population density, type of highway, emergency response capabilities, terrain/environmental factors, and accident statistics and are generated using PCMiner-Hazmat software. Where the cyanide route includes off-highway roads not covered within the regulatory data base, RSB seeks input from the consignor and consignee with regards to route hazards and measures to mitigate the risks and these are incorporated into the *Routing Package*.

In addition to RSB selecting routes that minimize risk, drivers are required to obey speed limits, exercise good judgement and professionalism, and adjust speed according to all conditions. The vehicles are equipped with mandatory Omnitracs Intelligent Vehicle Gateway (IVG) systems for electronic logging. The system telematics records driving violations or exceptions including speeding, harsh braking, acceleration, and un-signalled lane changes. The data on driver performance are summarized and reviewed weekly by management and actions are taken as applicable to ensure good driving habits are maintained.

The routes are adjusted based on the latest information generated by PCMiner-Hazmat, feedback from drivers during daily communication with dispatch, and updates on road conditions from the consignee.

On main highways, risk mitigation measures comprise obeying speed limits and signs and using defensive driving. Written procedures require drivers to exercise caution and shut down and notify dispatch in adverse conditions such as low visibility, poor weather, poor road conditions, night driving, or congested traffic. If winter road conditions are bad and "chain up" lights are flashing, procedures require drivers to get off the road until conditions improve. Specific written procedures are included in the Routing Package for driving on gravel highway and winter ice-road.

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Input from applicable governmental agencies, communities and other stakeholders is incorporated into route selection through utilizing PCMiner-Hazmat as the Hazmat compliant routes are established by applicable government agencies, that ensure adherence to local regularity requirements regarding safe transport of hazardous materials as well as input from local communities.

RSB is approved by the CTPAT/PIP program implemented to improve supply-chain security against terrorist, drug trafficking and other threats and as part of the program incorporates security measures to combat these threats. In addition, RSB live tracks each vehicle using a GPS tracking system and drivers can communicate with dispatch at any time.

Procedures to make the contractor aware of the applicable Code requirements are not required by RSB as only drivers that are full time employees of RSB transport hazardous goods, including cyanide.

**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.**

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

The operation is  
in substantial compliance with  
not in compliance with

*Summarize the basis for this Findings/Deficiencies Identified:*

RSB uses only trained, qualified and licensed operators to drive the trucks for cyanide transportation. New hires must have a minimum of 2-years on the road driving experience and are required to undertake a driving test with the RSB recruiter as part of a hiring evaluation. All drivers have Class 1A commercial driver licences and Transport of Dangerous Goods (TDG) certification. In addition, drivers are required to complete initial and refresher training that include Fire Extinguishers, Coupling and Uncoupling Trailers, Vehicle Backing, Pre-trip Equipment Inspection, Dry-van Cargo Securement, Flatbed Tie-down, Security and Threat Awareness, Hazmat Placarding, Transport of Dangerous Goods, Workplace Hazardous Materials Identification System (WHMIS), CTPAT/PIP Procedures, DuPont Transport Safety for Sodium and Potassium Cyanide (includes characteristics and hazards of cyanide and driver emergency response procedures), Professional Driver Improvement Course (PDIC) and Transport Accident/Incident Training. Copies of driver licences and TDG certificates and internal training certificates are maintained in personnel files. Training is tracked using computer software that provides alerts of pending driver training requirements.

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

■ **in full compliance with Transport Practice 1.3**

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The operation is in substantial compliance with  
not in compliance with

*Summarize the basis for this Findings/Deficiencies Identified:*

RSB only transports solid sodium cyanide briquettes packed in semi-bulk bag-in-box totes using only tractor trucks and dry-van trailers designed and maintained to operate within the loads it will be handling. In addition to two owned tractors, RSB has approximately 45 tractors and 90 vans on a three- or four-year lease and approximately 60 trailers owned and the remainder leased that are all less than 10 years old and are rated to carry 55,000 in (25 tonnes). Review of bills-of-lading for cyanide shipments indicate that the maximum loads transported are approximately 44,000 lb (20 tonnes).

Procedures are in place to ensure that trucks and trailers are inspected and maintained to safely transport the specified loads. As company policy, both tractors and trailers undergo preventative maintenance service inspections every six months. All vehicle inspection and maintenance work is contracted out to maintenance suppliers registered by a recognised authority or approved by RSB. Lease equipment is maintained by the leasing companies as part of the full-service contracts. RSB tracks and reviews the quality of maintenance performed and audits the top three maintenance suppliers every two years to ensure regulatory compliance and quality of work. Drivers are also required to undertake pre-departure, and enroute vehicle inspections and report any issues to dispatch.

Procedures in place to prevent overloading of the transport vehicle. Overloading is prevented by limiting the number of totes packed into the dry-van to nineteen and thereby maintaining a maximum load of near 44,000 lb (20 tonne). The load is weighed by the shipper and entered onto the Bill-of-Lading. The driver is also required to weigh the transport at a certified scale prior to commencing transport to ensure the load is correctly distributed across axles as per regulation.

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

- **in full compliance with Transport Practice 1.4**

The operation is in substantial compliance with  
not in compliance with

*Summarize the basis for this Findings/Deficiencies Identified:*

RSB does not load or unload shipments. Cyanide is loaded into the dry-van by the shipper. Procedures require RSB driver to inspect the dry van to ensure it is dry, clean of all nails and dunnage, and undamaged (no holes or leaks) prior beginning a trip. When receiving a shipment, the driver is responsible for checking that the load has been adequately blocked and braced to ensure safe transport of the goods. The driver is also responsible for strapping the load as required by regulation prior to the doors being closed and sealed with a seal provided

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by the shipper and/or a RSB bolt seal. The seal number(s) are recorded on the Bill-of-Lading and checked after each stop to confirm they have not been broken.

Drivers are responsible for placarding the trailer as soon as the trailer is loaded, checking the integrity of the placards every 2-hours on route, and removing the placards when shipment has been delivered and the trailer unloaded.

RSB has implemented a safety program for cyanide transport that includes pre-trip inspections; CTPAT/PIP security procedures; a preventative maintenance program on tractors and trailers; tracking operator driving hours to ensure compliance with U.S. and Canada legal requirements; ensuring loads are adequately blocked, braced and strapped prior to acceptance of the load from the shipper; and exercising caution in adverse road. RSB also has a strict drug and alcohol policy. The use of illegal or non-prescribed drugs by employees or owner operators is strictly prohibited and the consumption of alcohol within 24 hours of operating a vehicle is prohibited and liable to possible immediate suspension and disciplinary action up to and including dismissal. Records are maintained as per the Quality Management System requirements.

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

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

This requirement is not applicable as RSB does not transport cyanide by sea.

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

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

*Summarize the basis for this Findings/Deficiencies Identified:*

Drivers communicate (GPS, email, e-log, and voice communication) primarily via the Omnitrac communication system which uses cellular networks and satellite communication to provide almost complete coverage in North America. Most drivers also carry cell phones. The Omnitrac system is supplemented with VHS radios when using controlled access roads (e.g., gravel roads and winter ice-roads) where drivers are required to communicate with other road users and local dispatch centres that manage transport.

Procedures require drivers to regularly communicate with dispatch. These requirements include daily check calls, notifications on arrival and departure from shipper and consignees,

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sensor infrared security cameras. Site access is restricted, and the compound gate is locked after office hours. Current practice is to post a guard during out of office hours while cyanide trailers are parked in the compound. RSB has recently revised this practice to utilize the motion activated cameras to live monitor the compound 24/7 and report activity to specified recipients if cyanide trailers need to be temporarily parked in the compound in the future.

The dry-van trailers are designed to be watertight, and they remain locked while parked in the compound. The trailers undergo pre-trip inspections that include checking the integrity of the trailer for any leaks or potential holes. Any deficiencies are reported to dispatch and corrected before the trailer is used. Because of these procedures and the internal polyethylene moisture barriers used in each tote, there is minimum potential for the solid cyanide to come into contact with water. As the trailers are parked in the open and remain locked there is no risk of cyanide gas or cyanide dust exposure to workers. Also, as cyanide is not handled at the site and the dry-van trailers remain closed and sealed while parked in the compound an onsite spill is improbable and if it did occur would be contained within the watertight trailer.

**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.***

■ **in full compliance with Transport Practice 3.1**

The operation is

in substantial compliance with  
not in compliance with

*Summarize the basis for this Findings/Deficiencies Identified:*

RSB maintains an Emergency Response Plan in the form of an *Emergency Preparedness Package (EPP)* and *Transport Emergency Response Plan (TERP)*. The EPP includes accident guidelines that provide the responsibilities for drivers and office personnel; instructions for hazardous material emergency response; instructions specific for response to accidents involving transport of cyanide; a checklist for gathering and recording incident information via telephone, a checklist for recording response activities, and a checklist for recording times that entities are contacted. The TERP provides instructions for drivers in the event of a transport accident.

The EPP is considered appropriate for the transportation route, form of cyanide, type of vehicle, method of transport, and conditions of the roads travelled. RSB transports cyanide under separate contracts with Chemours (this contract scheduled to be modified to Draslovka as part of the ongoing transition of Chemours ownership over to Draslovka) and Univar. These shippers retain ownership of the cyanide throughout transport until delivery to the

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customer and have established emergency response plans for responding to cyanide emergencies during transport of their product. Chemours has an Emergency Response Assistance Plan (ERAP) approved by Transport Canada to cover emergency response in Canada and an account with CHEMTREC for emergency response in the USA. Univar has an ERAP approved by Transport Canada to cover emergency response in Canada and an agreement with Cyanco, the shipper, to use Cyanco's account with CHEMTREC for emergency response in the USA.

The EPP and TERP include descriptions of response actions that RSB personnel are required to undertake in the event of a transport accident including those involving hazardous materials. These response actions are considered appropriate for the transporter. The EPP and TERP provide the contact information for external responders. Drivers are instructed to notify the fire department (USA) or police (Canada), and if there is a spill or potential of a spill to notify ERAP (Canada) or CHEMTREC (USA). The ERAP and CHEMTREC call numbers are provided on the Bill-of-Lading.

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

- **in full compliance with Transport Practice 3.2**  
in substantial compliance with  
not in compliance with

The operation is

*Summarize the basis for this Findings/Deficiencies Identified:*

All drivers that transport hazardous material are required to maintain TDG certification and complete initial and refresher training programs that address awareness and handling of hazardous materials and emergency response. Refresher training is provided to drivers every two years by the Maintenance Co-ordinator/Recruiter; a certified TDG trainer and former Class 1 driving instructor. This training includes characteristics and hazards of cyanide and driver emergency response procedures. Training records are maintained in personnel files and tracked monthly using software that provides alerts on pending driver training requirements.

Descriptions of the specific emergency response duties and responsibilities of personnel are provided in the EPP and TERP. The TERP includes the actions drivers are required to take in the event of an emergency. The EPP provides the response actions for RSB office personnel and includes instructions and contact information for calling emergency responders, clients, and appropriate regulatory agencies; and checklists to track and document calls and response activities.

A list of the items included in an emergency response spill kit is provided in the RSB Employee Handbook which also states that drivers are responsible for ensuring that there is a first aid kit and complete spill kit are available when transporting hazardous materials. The equipment is considered appropriate for the driver response activities called for in the TERP. Drivers are

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measures would only be performed by trained emergency responders contracted by the cyanide shippers Univar and Chemours and activated through the CHEMTREC or ERAP emergency call numbers.

Transport Canada regulates and approves ERAPs to ensure all potential emergency scenarios are considered and the appropriate equipment and experienced response personnel are readily available to effectively respond. Based on review of the Transport Canada guidance website, the auditor considers that the ERAP addresses the requirements of this section of the Code. In the U.S., emergency response is conducted and directed by local, regional or federal authorities and emergency response contractors retained by the shippers. These response contractors include Special Response Services (SRS) and Specialized Professional Services Inc. (SPSI) that will be mobilized through CHEMTREC as needed.

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

- **in full compliance with Transport Practice 3.5**

The operation is  
in substantial compliance with  
not in compliance with

*Summarize the basis for this Findings/Deficiencies Identified:*

As set out in the roles and responsibilities in the QMS Manual the Safety & Maintenance Manager is responsible for ensuring the review and maintenance of the EPP including verification of phone numbers every 2 years. In practice the emergency procedures are reviewed more frequently as clientele changes, and contact information is reviewed at least annually prior to the start of each cyanide shipment consignment.

Mock drills are periodically conducted to determine if response procedures are adequate, equipment is appropriate, and personnel are properly trained. Drills are undertaken by RSB to simulate and evaluate transportation emergencies and by the cyanide shippers who implement and maintain and implement the emergency response plans for responding to cyanide releases and exposures.

Safety & Maintenance Manager is responsible for ensuring that mock drills (either live or table-top) are conducted annually. Records show that RSB conducted table-top scenarios in 2018 and 2019 and participated in a live drill in 2021. No drill was conducted in 2020 due to restrictions encountered by the Covid-19 pandemic. The exercises tested the response of RSB managers and dispatch in an emergency, i.e., managing communication with the driver, and notification and liaison of the responders, regulators, and other stakeholders in the event of a security, hazardous material release, or other emergency. Records of the drills include evaluations on the efficiency of the response, identify lessons learned, and provide recommendations for improvement.

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RSB driver initial training and refresher training is undertaken every 2 years. This training incorporates table-top exercises on driver emergency response procedures and precautions to be taken in event of a cyanide spill.

Discussions with emergency response representatives of Univar and Draslovka, indicate that they conduct technical advisor training or product stewardship programs as part of ERAP and their internal stewardship programs. These programs include training sessions, table-top exercises, mock drills, and review of lessons learned, and are generally conducted annually. Records of each exercise must be maintained as a requirement of ERAP.

To ensure that RSB conducts or is otherwise involved annually with mock drills (either live or table-top) that simulate transport-related cyanide exposures and releases, arrangements have been made with Draslovka for RSB to be included in all future table-top and training exercises associated with the Cyanide Code and ERAP.

Procedures are in place to evaluate the effectiveness of the EPP after its implementation and revise as needed. In the event of an accident an *Incident Report* is generated that includes specific details of the incident, evaluates the effectiveness of RSB's response and, as appropriate, makes recommendations for improvement. Although RSB has not had a transport incident involving cyanide, review of a record on an incident that occurred in June 2020 where a truck carrying a hazardous good was hit by another vehicle, provided evidence that RSB evaluated the response, made recommendations for improvement and updated emergency procedures.

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