



October 2013

INTERNATIONAL CYANIDE MANAGEMENT CODE

Wesbank Transport (Pty) Ltd Certification Audit, Summary Audit Report

Submitted to:

International Cyanide Management Institute
1400 I Street, NW - Suite 550
Washington, DC 20005
UNITED STATES OF AMERICA

Wesbank Transport (Pty) Ltd
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NAMIBIA

REPORT



Report Number. 137648019-009-R-Rev1

Distribution:

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1.0 INTRODUCTION

1.1 Operational Information

Name of Transportation Facility: Wesbank Transport (Pty) Ltd
Name of Facility Owner: Wesbank Transport (Pty) Ltd
Name of Facility Operator: Wesbank Transport (Pty) Ltd
Name of Responsible Manager: Kai Kutzner – General Manager SHEQ
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PO Box 2916
State/Province: Walvis Bay
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1.2 Description of Operation

1.2.1 Wesbank Transportation (Pty) Ltd

Wesbank Transport (Pty) Ltd (Wesbank) was founded in 1968. The company initially transported sand and crushed stone and then diversified into fishmeal and fish products. During this period, Wesbank acquired tractors and trailers to service the short-haul distances between the factories, the harbour and the rail terminal. To service the long-distance transport market, Wesbank gradually acquired appropriate handling, warehousing and transport facilities as the sector developed.

Wesbank's operations are located on four hectares of land in Walvis Bay. The facilities incorporate, Wesbank's head office an in-house weighbridge, an integrated synchronised fuel system, a tarpaulin cleaning system, a vehicle satellite tracking office and overnight facilities.

1.2.2 CSBP Ltd and AGR Australia Limited

AGR is the management company of the unincorporated joint venture between CSBP Ltd (CSBP) and Coogee Chemicals Pty Ltd. CSBP, a subsidiary of Wesfarmers Ltd, is the major participant in the venture and acts as both plant operator and sales agent.

Coogee Chemicals is a local manufacturer and distributor of industrial chemicals.

The AGR cyanide production facility is located within CSBP's fertiliser and chemicals complex at Kwinana, some 40 km south of Perth within the state of Western Australia. AGR produces and transports two different forms of sodium cyanide from the Kwinana production facility, namely solution and solids. Sodium cyanide solution is produced as a 30% liquid and solid sodium cyanide as a >97%, white briquette.

AGR in its capacity as the sales agent is responsible for the overall management of the sodium cyanide transportation activities including emergency response.

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1.2.3 General Technical Services CC

GTS is a logistics company that is contracted by AGR to manage the transportation of cyanide within Namibia. GTS subcontracts the trucking component of cyanide transportation within Namibia to Wesbank while GTS provides convoy supervision. This arrangement was terminated by AGR in February 2013.

1.2.4 Road Transportation

Wesbank is contracted by AGR to transport sodium cyanide, originating from its production facility in Kwinana, Western Australia, from the Port of Walvis Bay in Namibia to the Anglo Gold Ashanti Navachab Gold Mine (Navachab Mine). This arrangement has been in place since February 2013 and at the time of the Certification Audit, no cyanide had been transported. The first Wesbank convoy was planned for mid-2013. Prior to February 2013, AGR had contracted General Technical Services cc (GTS) to coordinate the transportation of its cyanide within Namibia. GTS, in turn had subcontracted Wesbank to undertake the road transportation on its behalf. Upon arrival at Walvis Bay Port, the offloading of all containers is performed under the management of Namport. Wesbank collects the containers within 24 hours of arrival and transports the containers to the designated area at Wesbank Walvis Bay Depot.

At the Navachab Mine, the containers are offloaded by the mining company. Wesbank will transport three containers in a convoy, although this may occasionally be five containers. The containers go straight to Navachab Mine unless there is inclement weather, in which the containers will be stored at Wesbank Transport Depot No. 2 for one to two days.

1.3 Transit Storage

Wesbank do not operate cyanide trans-shipping depots or interim storage sites. . During normal operations, cyanide containers collected from the Port of Walvis bay are delivered directly to the customer mine site. In the event of inclement weather such as a sandstorm, containers can be diverted from the Port of Walvis Bay to Wesbank's Walvis Bay Depot 2 until conditions improve. At Wesbank's Walvis Bay Depot 2 containers are not opened and they remain on the trucks.

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1.4 Auditors Findings and Attestation

in full compliance with
Wesbank Transport (Pty) Ltd is:
 in substantial compliance with
 not in compliance with
The International Cyanide Management Code

Audit Company: Golder Associates Pty Ltd
Audit Team Leader: Edward Clerk, CEnvP (112), RABQSA (020778)
Email: eclerk@golder.com.au

Name and Signatures of Other Auditors:


Name	Position	Signature	Date
Edward Clerk	Lead Auditor and Technical Specialist		17 July 2013

Dates of Audit:

This Wesbank Transport (Pty) Ltd Certification Audit was undertaken over two days between 9 and 10 April 2013.

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.

<u>Wesbank Transport (Pty) Ltd</u>		<u>2 October 2013</u>
Name of Facility	Signature of Lead Auditor	Date



2.0 CONSIGNOR SUMMARY

2.1 Principle 1 – Transport

Transport Cyanide in a manner that minimises the potential for accidents and releases.

2.1.1 Transport Practice 1.1

Select cyanide transport routes to minimise the potential for accidents and releases.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Wesbank is in FULL COMPLIANCE with Transport Practice 1.1 requiring cyanide transport routes are selected to minimise the potential for accidents and releases.

Wesbank has implemented a procedure for the selection of transport routes that minimises the potential for accidents and releases or the potential impacts of accidents and releases. Routes are assessed prior to commencement of the initial transport. Ongoing monitoring is conducted through driver trip reports and consultation with the mine. Prior to the Certification Audit, routes were assessed by the cyanide manufacturer. Since becoming an ICMC Signatory, Wesbank have taken on this responsibility.

Wesbank implements a procedure to regularly evaluate the risks of selected cyanide transport routes and take the measures necessary to manage these risks. Hazards are identified in the route risk assessment and suggested actions have been included for those risk issues. The risk assessment process applies an assessment ranking of low to extremely high risk for identified risks along the route. The risk assessment process applies an assessment ranking of low to extremely high risk for identified risks along the route:

- Low Risk – Risk does not require further action but must be monitored and measured to ensure risk levels do not increase.
- Medium Risk – Risk to be continually monitored with a view to reduce risk further.
- High Risk – Immediate action to be taken to reduce risk to an acceptable level. Risk reduction programme required.
- Extremely High Risk – intolerable – immediate action to be taken to reduce risk before activity can be resumed or discontinue activity.

Wesbank has implemented a procedure to periodically re-evaluate routes annually used for cyanide deliveries.

Wesbank has documented measures taken to address risks identified with the selected routes for example convoy speed. Measures to manage risks that were identified in the route risk assessment are documented in the route risk assessment report that describes the route. The measures include adhering to speed limits and ensuring the trip is done during daylight hours.

Consultation is primarily conducted by AGR and Navachab Mine, with Wesbank involved as required. Since 2010, AGR have consulted with the following regarding the transportation of cyanide along selected routes:

- Municipality of Walvis Bay

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- Namibian Police Traffic Unit
- Namibian Roads Authority.

Wesbank has a procedure for stakeholder consultation that specifies the responsibilities of stakeholders and to ensure that stakeholders are aware of their responsibilities. Wesbank states that the purpose of the procedure is to specify the responsibilities of each external stakeholders from who assistance could be required during an unwanted event of an incident.

There are few special safety concerns particularly in light of the Dune 7 route being used out of Walvis Bay. Security risks are not normally encountered. Convoys are used as a means of managing the risks of the road conditions (traffic and people, road workers) and responding to emergencies.

Consultation is primarily conducted by AGR and Navachab Mine, with Wesbank involved as required.

Consultation with external responders, medical facilities and communities is primarily conducted by AGR and Navachab Mine, with Wesbank involved as required.

AGR consulted with the following stakeholders and applicable governmental agencies:

- Municipality of Walvis Bay
- Namibian Police Traffic Unit
- Cottage Medi-Clinic
- Welwitschia Hospital.

Wesbank does not subcontract any of the cyanide handling or transport.

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2.1.2 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

The operation is

in substantial compliance with

Transport Practice 1.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Wesbank is in FULL COMPLIANCE with Standard of Practice 1.2 requiring that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

Wesbank only uses trained and competent operators to drive its trucks. Wesbank's Traffic Management Plan states that the driver of a dangerous goods vehicle shall:

- Have a Provisional Drivers Permit – Category "D" (PrDP-D) and shall carry it on his person, where required in terms of national legislation.
- Be fit to drive in terms of the relevant national legislation.
- Be able to interpret and implement the instructions on the transport emergency card.
- Receive annual comprehensive theoretical and practical training relevant to the type of vehicle and to the dangerous goods which will be assigned to him, including training in the procedures specific to sodium cyanide.

Prior to employment, the licence categories and currency are checked as part of the employee pre-employment checks.

Wesbank trains personnel operating cyanide handling and transport equipment to perform their jobs in a manner that minimises the potential for cyanide releases and exposures.

A review of training records and interviews with drivers indicated that training is undertaken as planned.

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2.1.3 Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Wesbank is in FULL COMPLIANCE with Standard of Practice 1.3 requiring that transport equipment is suitable for the cyanide shipment.

Wesbank only uses equipment designed and maintained to operate within the cyanide loads it will be handling. Equipment consists of five dedicated road vehicles (prime mover and trailers) that were purchased to a design specification appropriate for the cyanide transport task. Vehicle power, axle loadings and other parameters are set by the manufacturer and the loads are within the legal capacities of the public roads.

Wesbank maintains records of vehicle specifications and maintenance history. The company has a program of preventative maintenance and enough capacity to ensure that they always have enough vehicles on the road for the task.

Wesbank has established procedures to verify the adequacy of the equipment for the load it must bear and to prevent overloading. Prior to each departure to the Port of Walvis Bay to pick up the cyanide containers, Wesbank conduct a series of checks on the truck tractors, trailers and Convoy Leader's vehicle. From the Port of Walvis Bay, the convoy drives straight to Navachab Mine unless delayed by inclement weather. Once en route, all two axle vehicles are required to pass over a Government weighbridge before leaving Walvis Bay to confirm that loads are within the required limits (maximum 24 tonnes). This forms another check to ensure the vehicles are not overloaded.

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2.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

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

Summarise the basis for this Finding/Deficiencies Identified:

Wesbank is in FULL COMPLIANCE with Transport Practice 1.4 requiring the operation develop and implement a safety programme for transport of cyanide.

Wesbank has procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging. There is a provision to check the containers prior to loading at the Port to ensure the seals are intact, warning placarding is in place, numbers are recorded and the container is in a fit state to be transported.

The Dangerous Goods Transport laws in Namibia require that an orange coloured diamond denoting dangerous goods is on the front of the prime mover and an emergency information panel is on the rear of the prime mover. As all cyanide is delivered by sea, containers arrive placarded by AGR in Australia, in accordance with the International Maritime Dangerous Goods (IMDG) Code. These placards remain on the containers until the containers are unpacked and decontaminated.

Wesbank implements a safety program for cyanide transport that includes (where appropriate or applicable) the following:

- a) Vehicle inspections prior to each departure/shipment.
- b) A preventative maintenance program.
- c) Limitations on operator or drivers' hours.
- d) Procedures to prevent loads from shifting.
- e) Procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered.
- f) A drug abuse prevention program.
- g) Retention of records documenting that the above activities have been conducted.

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2.1.5 Transport Practice 1.5

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

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

Summarise the basis for this Finding/Deficiencies Identified:

Transport Practice 1.5 requiring the operation follow international standards for transportation of cyanide by sea and air, is NOT APPLICABLE to Wesbank.

Transportation of Wesbank's cyanide does not occur by sea or air within the scope of this audit.

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2.1.6 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

Summarise the basis for this Finding/Deficiencies Identified:

Wesbank is in FULL COMPLIANCE with Standard of Practice 1.6 requiring the operation track cyanide shipments to prevent losses during transport.

Transport vehicles have means to communicate with the transport company, the mining operation, the cyanide producer or distributor and/or emergency responders.

All Wesbank vehicles have communications systems that include a satellite GPS, radios and mobile phones. Wesbank use the communication equipment daily which functions as a test procedure. Communication systems must be checked prior to the convoy leaving the Wesbank Transport Depot No. 2.

Wesbank advised that no total communication blackout areas exist along the transport route resulting in communication being primarily via radio for convoy communication and cell phone for other communication.

Wesbank uses C-Track, a hard wired GPS tracking system to monitor the progress of cyanide shipments remotely. The system tracks convoy progress and logs data relating to position, speeds and harsh breaking.

Cargo documentation must be carried in the transport vehicle. A checklist requires checks to be made on the integrity of the producers packaging through a check of the container and container seal numbers. The checklist is completed by the Wesbank Convoy Leader prior to the departure of each convoy. This checklist also includes the date and time of arrival at Navachab Mine.

Shipping records indicating the amount of cyanide in transit and data sheets that indicate the presence of cyanide and describe the necessary handling precautions are available during transport. Shipping documents are included as part of every consignment.

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2.2 Principle 2 – Interim Storage

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

2.2.1 Transport Practice 2.1

Store cyanide in a manner that minimises the potential for accidental releases.

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

Summarise the basis for this Finding/Deficiencies Identified:

Transport Practice 2.1 is NOT APPLICABLE to Wesbank, requiring transporters design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures.

Wesbank do not operate cyanide trans-shipping depots or interim storage sites. During normal operations, cyanide containers collected from the Port of Walvis bay are delivered directly to the customer mine site. In the event of inclement weather such as a sandstorm, containers can be diverted from the Port of Walvis Bay to Wesbank’s Walvis Bay Depot 2 until conditions improve. At Wesbank’s Walvis Bay Depot 2 containers are not opened and they remain on the trucks.

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2.3 Principle 3 – Emergency Response

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

2.3.1 Transport Practice 3.1

Prepare detailed Emergency Response Plans for potential cyanide releases.

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

Summarise the basis for this Finding/Deficiencies Identified:

Wesbank is in FULL COMPLIANCE with Standard of Practice 3.1 requiring the operation prepare detailed Emergency Response Plans for potential cyanide releases.

Wesbank has developed an Emergency Response Plan (ERP) for potential cyanide releases for cyanide transportation within Namibia. The scope of the emergency response plan is to provide information for Wesbank personnel that will be involved in the primary stage of the emergency, with Navachab in control of the second phase. The ERP is appropriate for the selected transportation routes. The route is on road and the ERP describes the roles in an incident for both internal and external responders.

Wesbank transports only solid sodium cyanide, and the ERP considers and includes details on this form of cyanide.

The ERP is based on road transportation between the Walvis Bay Port and the Navachab Mine. Wesbank continually reviews the condition or the routes and associated hazards.

Transportation to Navachab Mine is via a sealed two lane road. The ERP considers the design of the transport vehicles as it is specifically drafted around the transport of solid cyanide on semi-trailers. The ERP includes descriptions of response actions, as appropriate for the anticipated emergency situation.

The ERP contains emergency response guides to be followed in the event of an incident involving cyanide.

The Transport Management Plan and ERP identify the roles of outside responders and medical facilities in emergency response procedures.

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2.3.2 Transport Practice 3.2

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

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Wesbank is in FULL COMPLIANCE with Standard of Practice 3.2 requiring the operation designate appropriate response personnel and commit necessary resources for emergency response.

Wesbank provides emergency response training of appropriate personnel.

The ERP does identify the specific emergency response duties and responsibilities of personnel. The ERP includes responsibilities for the following:

- Convoy Leader
- Truck drivers
- Wesbank Transport Depot, Short Haul Division
- Wesbank Transport Management.

Emergency response equipment is carried on each truck and the presence of the equipment is checked prior to each departure by the drivers and supervisor. Wesbank also maintain an emergency response trailer capable of providing secondary response equipment for both cyanide emergencies. Procedures are in place to inspect emergency response equipment and assure its availability when required.

Wesbank has available the necessary emergency response and health and safety equipment, including personal protective equipment during transport.

Wesbank receives initial and periodic refresher training in emergency response procedures including implementation of the ERP. The training matrix indicates that all drivers have undertaken all required emergency response training.

While Wesbank does not subcontract cyanide handling or transport, it does use Navachab Mine as the primary responder during cyanide transport incidents. This is stated in the ERP and agreed to by Navachab Mine.

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2.3.3 Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Wesbank is in FULL COMPLIANCE with Standard of Practice 3.3 requiring the operating develop procedures for internal and external emergency notification and reporting.

The ERP contains procedures and current contact information for notifying the receiver/consignee, outside response providers, and medical facilities of an emergency.

There are provisions to ensure that internal and external emergency notification and reporting procedures are kept current in the Transport Management Plan. The ERP and the Transport Management Plan also include a provision to be revised annually.

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2.3.4 Transport Practice 3.4

Develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Wesbank is in FULL COMPLIANCE with Standard of Practice 3.4 requiring the operation develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

The ERP states that the management strategy for a spill is to clean-up any spilled product under the supervision from the Navachab Mine. As such, Wesbank is not required to have a spill response procedure or prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide as they are not kept by Wesbank and do not form part of the emergency response equipment.

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2.3.5 Transport Practice 3.5

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

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Wesbank is in FULL COMPLIANCE with Standard of Practice 3.5 requiring the operation periodically evaluate response procedures and capabilities and revise them as needed.

The ERP and Transport Management Plan contain provisions to review and evaluating the Plans' adequacy. There are provisions to ensure that internal and external emergency notification and reporting procedures are kept current.

The ERP contains provisions for conducting mock emergency drills annually. A full scale emergency response exercise must be held annually in conjunction with the Navachab Mine. On 15 February 2012, Wesbank completed a mock drill of a transport road incident that had a possible cyanide spillage. On 7 February 2013 Wesbank conducted another drill that included cyanide being spilled at Wesbank Transport Depot No 2.

The ERP contains provisions for periodically reviewing and evaluating the Plan's adequacy and ensuring they are being implemented.

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3.0 LIMITATIONS

Your attention is drawn to the document - "Limitations", which is included as Appendix A to this report. This document is intended to assist you in ensuring that your expectations of this report are realistic, and that you understand the inherent limitations of a report of this nature. If you are uncertain as to whether this report is appropriate for any particular purpose please discuss this issue with us.

Wesbank Transport (Pty) Ltd

Name of Facility

Signature of Lead Auditor

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Date



Report Signature Page

GOLDER ASSOCIATES PTY LTD

A handwritten signature in black ink, appearing to read 'Ed Clerk'.

Ed Clerk
ICMI Lead Auditor and ICMI Technical Specialist

RB/EWC/se

A.B.N. 64 006 107 857

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APPENDIX A

Limitations



LIMITATIONS

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