

# SUMMARY AUDIT REPORT

## Operation General Information

Name of Transportation Operation: Central Forwarding Agency Sdn Bhd

Name of Facility Owner: Central Forwarding Agency Sdn Bhd

Name of Facility Operator: Mr Chair Ming Ming

Name of Responsible Manager: Mr Chair Ming Ming

Address: Lot 64393, Jalan Perigi Nenas 8/10, Kawasan Perindustrian Pulau Indah, 42920 Port Klang, Selangor

State/Province: Port Klang, Selangor

Country: Malaysia

Telephone: 03-3168 9001

E-Mail: cmming@cfa.com.my

## Operation Location Detail and Description

### Overview

Scope of Verification Audit (in accordance with International Cyanide Management Institute – Cyanide Transportation Verification Protocol for the International Cyanide Management Code dated June 2021)

Central Forwarding Agency (CFA) appointed transporter by ORICA - transporting the IBC with sodium cyanide stored maritime containers and the sodium cyanide briquettes in isotanks from and to Port Klang seaport respectively.

CFA

*Danny Tan*

12 Sep 2023

Name of Operation:

Signature of Lead Auditor  
& Technical Expert

Date:

# SUMMARY AUDIT REPORT

## *Auditor's Finding*

This operation is

- in full compliance
- in substantial compliance \*(see below)
- not in compliance

with the International Cyanide Management Code.

## **Compliance Statement**

The Summary Audit Report for a recertification audit must include one additional statement that is not required in the Summary Audit Report for an initial certification audit. For a transportation operation found in full compliance with the Code, the report must indicate whether the operation had any compliance issues or significant cyanide incidents since its previous certification and identify where in the report such information can be found.

## **Auditor Information**

Audit Company: Danny Tan

Lead Auditor: Danny Tan

Lead Auditor Email: dannytan163@yahoo.com.sg

Dates of Audit: 20 to 22 Jun 2023

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*Danny Tan*

12 Sep 2023

Name of Operation:

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& Technical Expert

Date:

# SUMMARY AUDIT REPORT

## Auditor Attestation

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, 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 Certification Auditors.

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

CFA	<i>Danny Tan</i>	12 Sep 2023
Name of Operation	Signature of Lead Auditor	Date

CFA	<i>Danny Tan</i>	12 Sep 2023
Name of Operation:	Signature of Lead Auditor & Technical Expert	Date:

# SUMMARY AUDIT REPORT

## Principles and Standards of Practice

### Principle 1 | TRANSPORT

Transport cyanide in a manner that minimizes the potential for accidents and releases.

Standard of Practice 1.1:

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

in full compliance with

The operation is  in substantial compliance with Standard of Practice 1.1

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

CFA conducted a comprehensive route assessment (revised risk assessment dated 22 Sep 22) for cyanide transportation route to Westport. The review of risk assessment from Capitol Warehouse to Westport Container Terminal dated 9 Jan 2023 – 7mins (2.6km) and CFA/ST/P3.0 dated 1 Sep 2022 and based on documented information and on-site verification, selection of route was based on the minimizing the potential accidents and releases or the potential impacts of accidents with due consideration given for the following:

- a) Population density (Industrial and Housing Estate)
- b) Infrastructure (roadway, rail, port) construction and condition (Railway track)
- c) Pitch and grade (Highway up to bridge)
- d) Prevalence and proximity of water bodies and fog (River Klang)

CFA implemented a process and written document (risk assessment dated 22 Sep 22). These procedures adequately outline the evaluation of risks in the selection of the cyanide transportation routes with appropriate risk management controls documented (Hazard Identification, Risk Assessment as revised on 18 Aug 2023) A process on collecting feedback on route condition from the CFA drivers was verified with drivers during onsite audit and in accordance with implemented road transport routes. Community consultation from local authorities and village chiefs for route selection and assessment as reflected in the email correspondence dated 7 Jul 2023.

As part of overall consideration for risk assessment and the relatively short distance from Capitol Warehouse to Westport and verified during onsite route assessment, it was noted that CFA assess that there is no special safety or security concerns, that warrants the use of convoys, escorts or other additional safety or security measures. It was noted that currently only Westport Terminal is being used and no transport of cyanide was made to Northport Terminal.

CFA do not contract entities to conduct land transportation.

CFA

*Danny Tan*

12 Sep 2023

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# SUMMARY AUDIT REPORT

## Standard of 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 Standard of Practice 1.2

not in compliance with

## Summarize the basis for this Finding/Deficiencies Identified:

Based on review of work instructions – driver recruitment, driver selection as reviewed with training records dated 5 May 23 for personnel operating forklift and associated qualification process formally documented (Selection Criteria dated 17 Oct 2022 for minimum baseline such as screening of criminal records, medically fit whereby the requirements of Class E (Malaysia requirements for qualifications of driving container).

Sighted new driver orientation checklist dated 28 Mar 2022 (Mr Wahab) and corresponding driver recruitment process dated 20 Nov 2019 such as safe work procedure, briefing on MSDS, emergency response procedures and personal protective equipment familiarisation. CFA has a pool of 4 drivers.

- Validated safety refresher for truck drivers dated 13 May 2023 training content such as causes of accidents at work, safe journey and importance of Personal protective equipment)

CFA do not contract entities to conduct land transportation.

CFA

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12 Sep 2023

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# SUMMARY AUDIT REPORT

Standard of Practice 1.3:

Ensure that transport equipment is suitable for the cyanide shipment.

in full compliance with

The operation is  in substantial compliance with Standard of Practice 1.3

not in compliance with

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

Based on interview with site personnel, it was noted that procedures are in place to prevent overloading of the transport vehicle being used for handling cyanide (Safety Work Instruction – Securing of Container and Goods RTS -SWI-01, Coupling and decoupling of trailer RTS – SWI -02 and Container Side Lifter)

The above are also validated with container dispatch advice dated 18 Jun 2023 and noted that 15 containers gross weight 363,030.00kg which translates to per container 24202kg and noted that the trailer used is designed to carry load of 34460kg (verified with Ministry of Transport) and Forklift – capacity is 3000kg and individual crate of IBC is 1135kg.

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CFA

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12 Sep 2023

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& Technical Expert

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# SUMMARY AUDIT REPORT

## Standard of Practice 1.4:

*Develop and implement a safety program for transport of cyanide.*

in full compliance with

The operation is  in substantial compliance with Standard of Practice 1.4

not in compliance with

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

Based on onsite observations, it was noted that placards used to identify the shipment as cyanide, as required by local regulations, including international standards.

Reviewed Safety and Toolbox meeting dated 29 May 2023 conducted by Supervisor covering topics such as coupling and decoupling procedure refresher, safety on the road, fatigue control, over speeding, pre-trip inspection checklist response actions in the event of road accidents and Personal Protective Equipment and validated with onsite interview held with personnel on site.

Reviewed vehicle maintenance record between Dec 2022 till Feb 2023 with servicing requirement when vehicle clocks 15000km and/or 2 months. Verified both haulage and trailer maintenance program from Jul to Sep 2023. Verified vehicle inspection checklists for isotank(7 Oct 23), Primer Mover and Trailer (25 Sep 2023).

Limitations on operator or drivers' hours as reflected SOP – Drivers working hours and fatigue management plan dated 8 Nov 2022 with maximum of 4 hours driving and rest of minimum 30 minutes interval.  
Reviewed SOP – Trailer Twist Lock dated 3 Oct 2022 on twist lock procedures to prevent loads from shifting and verified onsite.  
As reflected in SOP – Severe weather or civil unrest all transportation will cease and reroute.  
(To define severe weather and actions to be taken by driver)

Drug abuse program in place as documented in Level 2 - 001 Driver Management procedures Clause 7 Driver Health & Welfare and verified with drivers' sample tests conducted between 25 Jul and 2 Aug 2023. Records are retained for a period of 3 years (008-SOP-RTS dated 1 Aug 2023)

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# SUMMARY AUDIT REPORT

Standard of Practice 1.5:

*Follow international standards for transportation of cyanide by sea.*

in full compliance with

The operation is  in substantial compliance with Standard of Practice 1.5

not in compliance with

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

CFA scope of ICMI cyanide transportation does not apply to transport of cyanide by sea.

CFA

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& Technical Expert

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# SUMMARY AUDIT REPORT

## Standard of Practice 1.6:

Track cyanide shipments to prevent losses during transport.

in full compliance with

The operation is  in substantial compliance with Standard of Practice 1.6

not in compliance with

## Summarize the basis for this Finding/Deficiencies Identified:

Means of communication is through mobile phones as verified onsite observation due to the relatively short distance from Capitol Warehouse to Westport Terminal and noted that there are no blackout areas along the selected route.

Reviewed records of GPS tracking (Gussman) dated 8 Jan 2023 (FC23\_WQG7176) from Capitol to Northport from 0754 to 0850.

Reviewed records of GPS tracking (Gussman) dated 19 Jun 2023 (FC12\_WQG 7169) from Westport to Capitol from 0922 to 0956.

Reviewed records of GPS tracking (Gussman) dated 19 Jun 2023 (FC22\_WQG7169) from Capitol to Westport from 1019 to 1031.

After evaluation of the above reviews, CFA has the system in place to track the progress of their cyanide shipments.

Based on review of Cargo Move (Cargo lodging system) by Port Klang which captures the inventory controls and chain of custody documentation as sampled with:

- Container No: ORA 4595, weight 27065kgs Date 19 Jun from 7am to 11pm approved for temporary storage in Westport for a maximum of 24hours (Driver Mr Bokri, Vehicle WQG 7169 – date of previous service 1 Dec 2022 and next servicing for 15000km)
- Container No: RXTU2044962, Date 19 Jun at (Driver Mr Shahrul, Vehicle WPB 4620 – date of previous service 1 Dec 2022 with servicing records on 14 Feb 2023).

On-site route assessment and interviews with branch manager, yard manager, transport manager and escort leader were held. Along with respective delivery orders and accompanying MSDS verified with shipments records; are indicative that system is in place to ensure tracking of cyanide shipments and loss prevention.

CFA do not contract entities to conduct land transportation.

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12 Sep 2023

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# SUMMARY AUDIT REPORT

## Principle 2 | INTERIM STORAGE

### Design, construct and operate cyanide interim storage sites to prevent releases and exposures.

#### Standard of Practice 2.1:

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

in full compliance with

The operation is  in substantial compliance with Standard of Practice 2.1

not in compliance with

#### Summarize the basis for this Finding/Deficiencies Identified:

Warning signs are visible in both Malaysian and English language at the entrance of Capitol Warehouse to alert personnel the presence of cyanide; that smoking, open flames, eating and drinking are not allowed and what personal protective equipment are needed to be worn.

Verified that the current infrastructure for floor and walls of this enclosed interim storage area/repacking areas provide sufficient secondary containment for truck trailers containing packaged solid cyanide in Intermediate Bulk Containers and drums. Secondary containment is not needed for cyanide containers built specifically for outside storage such as isotainers and sea containers containing Intermediate Bulk Containers.

Security is being ensured with a security post managed by outsourced security services as observed during on-site visits. Visitors access control is in place and monitored for entrance to warehouse including areas designated for cyanide storage.

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## Principle 3 | EMERGENCY RESPONSE

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

Standard of Practice3.1:

*Prepare detailed emergency response plans for potential cyanide releases.*

in full compliance with

The operation is  in substantial compliance with Standard of Practice3.1

not in compliance with

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

CFA had implemented procedure (OM- SD-001 Emergency Response Procedure and 007-SOP-RTS, Transport Emergency Response Plan dated 1 Aug 2023) for emergency response plans (ERP) to address potential cyanide releases for both interim storage and land transportation. Management of the following identified incidents leading to potential cyanide release derived were from risk assessment:

- Chemical Spillage during land transportation
- Vehicle accidents
- Loading and unloading accidents
- Fire at interim storage

Respective classifications of incidents (such as accidental sodium cyanide poisoning and spill to waterway) correspond with incident response structure for basic incident and specific emergency response guide taking into account the physical and chemical form of cyanide during accidental release. Requirements of transport infrastructure are considered as part of the overall ERP:

- Personnel Protective Equipment
- Recovery vehicle
- Evacuation zones
- Communications with external responders
- Respective roles and integrated response with local communities, medical facilities, local authorities, fire departments and ORICA
- MSDS – Sodium Cyanide
- ICMI Notification Process

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12 Sep 2023

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# SUMMARY AUDIT REPORT

Standard of 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 Standard of Practice 3.2
- not in compliance with

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

CFA implemented procedure (OM- SD-001 Emergency Response Procedure and 007-SOP-RTS, Transport Emergency Response Plan dated 1 Aug 2023) and based on interview with site personnel including ERP awareness training for personnel involved interim storage and transportation operations covering the following:

- Specific roles and responsibilities during activation of ERP
- Interim storage and transportation designated emergency response equipment
- Personal Protective Equipment (PPE)

This includes specific cyanide emergency response duties and responsibilities assigned to its personnel and outside responders during response to emergency incidents such as leakage or spillage.

- To carry out initial action to contain the leakage
- To alert local authorities
- To minimize the risk to people and environment

A maintenance regime was established to ensure the assurance on the functionality of the emergency response equipment. Records are maintained for this regime along with the list emergency response required for ERP for transportation operations.

Training records (Emergency and Critical Response Training for Cyanide and Other Hazards) and appropriate materials were reviewed to ascertain the relevancy and applications.

Verified Safety Triangle, Torch light, 1<sup>st</sup> aid Kit, Safety Cone, Delineator are the list of Fleet Emergency Equipment .

Verified Cyanide Emergency Kit is stored at interim storage location (Capitol Warehouse) it will be pickup when Fleet Response Team is activated.

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# SUMMARY AUDIT REPORT

Standard of Practice 3.3:

*Develop procedures for internal and external emergency notification and reporting.*

in full compliance with

The operation is  in substantial compliance with Standard of Practice 3.3

not in compliance with

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

CFA procedure (OM- SD-001 Emergency Response Procedure and 007-SOP-RTS, Transport Emergency Response Plan dated 1 Aug 2023) depicts contact information for respective notification of emergencies in the event of emergencies that occur during transportation. Implemented ERP procedure covers both internal and external emergency notification and reporting as part of the incident response structure. This is being reviewed during toolbox meeting prior to land transportation. Contact lists are currently updated during these meetings.

Records are maintained with the list of emergency response contacts required for ERP for yard and transportation operations. On-site interviews held with respective personnel verified that the implemented ERP and associated contact lists.

Management/Flowchart is in place to notify ICMI of significant cyanide incidents. Based on interviews held with onsite personnel, it is verified that till date no significant cyanide incident has happened that required to notify ICMI.

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# SUMMARY AUDIT REPORT

Standard of Practice 3.4:

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

in full compliance with

The operation is  in substantial compliance with Standard of Practice 3.4

not in compliance with

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

CFA procedure (OM- SD-001 Emergency Response Procedure) outline the spill contingency plan in the event of accidental spillage; of which Orica will provide the required responses including procedures for remediation, such as recovery or neutralization of solutions or solids and decontamination of soils or other contaminated media. It addresses the prohibition on the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface waters. the cyanide handling or transport.

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Standard of 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 Standard of Practice 3.5

not in compliance with

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

Mock drills are conducted on 25 Aug 2023 with records of this mock drill maintained and key observations are subsequently incorporated with the list emergency response contacts required for ERP for interim storage and transportation operations being updated.

Based on post review and observations conducted after this mock drill and it is indicated that ERP is in place with assigned trained personnel and appropriate equipment. External responders (Ambulance services) supported this mock drill for overall assessment of ERP effectiveness. Future cyanide emergency drills were drawn up for the next year covering scenarios such as Cyanide spill into drain or accidental release of untreated IBC in to drain and cyanide caught fire inside warehouse.

Verified that CFA had planned for 3 scenarios will include both release and exposure for 3 years onward of Transport Emergency Drill regarding sodium cyanide for respective scenarios; Sodium Cyanide Leak on the road due to rupture isotank, Sodium Cyanide Leak and Exposure in a Transportation Accident and Sodium Cyanide Exposure to First Responders.

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