# 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.

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***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.

This operation has not experienced any significant cyanide incident during the previous three-year audit cycle.

## Auditor Information

Audit Company: Danny Tan

Lead Auditor: Danny Tan

Lead Auditor Email: dannytan163@yahoo.com.sg

Dates of Audit: 1 to 3 Apr 2026

| Name of Operation: | Signature of Lead Auditor & Technical Expert | Date: |
|---|---|---|
| CFA | Danny Tan | 9 Jun 2026 |

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**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 | *Danny Tan* | 9 Jun 2026 |
| Name of Operation | Signature of Lead Auditor | Date |

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## 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.*

The operation is
- ☑ in full compliance with
- ☐ in substantial compliance with Standard of Practice 1.1
- ☐ not in compliance with

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

CFA has established and implemented a documented route assessment process for the transportation of cyanide from Capitol Warehouse to Westport Container Terminal (distance: 2.6 km; approximately 7 minutes). The following objective evidence was reviewed and verified:

**Route Assessment & Risk Documentation**

- Revised Risk Assessment – Journey Management Plan dated 30 Dec 2025, incorporating considerations for population density (industrial and housing estate areas), road and rail infrastructure conditions, pitch and grade along the highway approach to the bridge, and proximity to the River Klang.
- Hazard Identification, Risk Assessment and Risk Control Register – dated 14 Aug 2025, which includes cargo misplacement controls such as pre-transportation briefings, refresher safety training, and Safety Work Instructions for container securing.
- SOP – Route Selection / Project Safety Plan (Rev. 001, dated 20 Jan 2026), formalising all route selection criteria that includes reassess route safety using documented driver feedback and incident data. All routes undergo periodic checks and a mandatory annual review to maintain safety and compliance.

**Stakeholder Consultation**

- Debrief and Stakeholders Consultation Records with Fire Department and Police – dated 24 Dec 2025, demonstrating engagement with relevant authorities in route planning.
- Community input from local authorities was factored into route selection and risk management measures.

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**Driver Feedback & Route Re-evaluation**

- A structured feedback mechanism is in place for drivers to report route conditions, and the road-condition feedback form is being formalised to capture reportable items systematically. Implemented records [5 Feb 2026] demonstrate systematic route safety controls, including driver competency, hazard identification, route assessments, and continuous monitoring to ensure safe transportation operations

- Population distribution data sourced from the Control of Industrial Major Accident Hazards (CIMAH) Report – Jul 2025 was integrated into the Journey Management Plan.

Given the short transport distance and low risk profile, CFA has assessed that no convoy, escort, or supplementary safety measures are required. This determination is documented and consistent with the risk assessment findings.

Cyanide transport is currently limited to Westport Terminal; no transport to Northport Terminal has been conducted.

CFA does not engage third-party contractors for land transportation activities.

*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.*

The operation is
- ☑ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 1.2

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

CFA has implemented a structured driver recruitment, qualification, and training programme for all personnel involved in cyanide handling and transportation. The following objective evidence was reviewed and verified:

**Driver Qualification & Recruitment**

- Driver Management SOP – Project Safety Plan (Rev. 001, dated 20 Jan 2026) defines the minimum selection criteria, including screening of criminal records, medical fitness, and possession of a Class E licence (Malaysian regulatory requirement for container transport).

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- Drivers assigned to cyanide transport routes are required to complete specific safety induction and emergency response training before authorization. Documented evidence [24 Jan 2026] confirms training completion and competency validation through formal internal programs.
- CFA currently maintains a qualified pool of four (4) dedicated cyanide transport drivers.

**Training Records & Competency Verification**

- Defensive Driving Training – dated 14 Jun 2025.
- Basic Safety Pertaining to Cyanide Handling – dated 27 Jan 2026.
- Driver Training Records – dated 24 May 2025, with competency verified through on-site driver interviews conducted on 3 Apr 2026, covering Traffic Management Plan, Emergency Contact List, and Safety Data Sheet awareness.

**Ongoing Briefings & Toolbox Meetings**

- Toolbox Meetings conducted on 22 Dec 2025, 8 Feb 2025, and 1 Dec 2025, addressing road safety topics including pothole awareness, tyre pressure and tread depth monitoring, traffic congestion management, and driver responsibilities.
- Driver acknowledgment of the Safety Data Sheet is obtained during the pre-delivery vehicle checklist submission prior to each cyanide transportation run.

*Standard of Practice 1.3:*

*Ensure that transport equipment is suitable for the cyanide shipment.*

The operation is
☑ in full compliance with
☐ in substantial compliance with
☐ not in compliance with
Standard of Practice 1.3

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

CFA has established procedures to ensure all transport equipment is suitable, maintained, and not overloaded for cyanide cargo operations. The following objective evidence was reviewed and verified:

**Equipment Suitability & Load Verification**

- Fleet Selection Procedure – SOP Project Safety Plan (Rev. 001, dated 20 Jan 2026) specifies cargo weight limits, with a maximum gross vehicle weight of 41,000 kg as stipulated by local authority (BDM). Before dispatch, Operations and the driver verify that the combined weight of the prime mover, trailer, and loaded sodium cyanide container does not exceed the authorized vehicle limits, ensuring compliance with road regulations.
- Request for Transport – dated 4 Feb 2026, confirming a per-truck payload of 27,000 kg, verified by Malaysia Customs and Port Authorities for export compliance.
- Container Dispatch Advice – dated 18 Jun 2023: 15 containers with a gross weight of 363,030 kg (approx. 24,202 kg per container); trailer rated at 34,460 kg (Ministry of Transport verified); forklift capacity confirmed at 3,000 kg against individual IBC crate weight of 1,135 kg.

**Safe Load Handling Procedures**

- Safety Work Instructions – Securing of Container and Goods (RTS-SWI-01) and Coupling & Decoupling of Trailer (RTS-SWI-02) formalize procedures for safe load securing and equipment operation.
- SOP – Project Safety Plan/Safety Work Instruction (Rev. 001, dated 20 Jan 2026) formalizes the verification process for confirming trailer load adequacy prior to departure.

CFA does not engage third-party contractors for land transportation activities.

*Standard of Practice1.4:*

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

The operation is
- ☑ in full compliance with
- ☐ in substantial compliance with Standard of Practice 1.4
- ☐ not in compliance with

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

CFA has developed and implemented a comprehensive transport safety programme encompassing all required elements under Transport Practice 1.4. The following objective evidence was reviewed and verified:

**Hazardous Goods Identification**

- Placards and signage conforming to local regulations and international standards are in place to identify all cyanide shipments during transport.
- Seal number verification against delivery orders for ISOtainers is performed prior to each export shipment, as specified in the Securing of Container and Goods SOP (Rev. 001, dated 20 Jan 2026).

**Vehicle Inspections & Preventive Maintenance**

- Daily Vehicle Checklist – 14 Jan 2026 (Vehicle No. 33); vehicle maintenance records verified against service schedule dated 5 Sep 2025. Implemented records demonstrate that container seals were checked and confirmed intact, container numbers were verified against the consignment note, and all bookings were completed through the designated online system.
- Fleet Preventive Maintenance SOP (Rev. 001, dated 20 Jan 2026): maintenance interval defined at 15,000 km or six months, whichever occurs first.
- Verified haulage and trailer maintenance records for the period Nov 2025 to Jan 2026.

**Driver Hours & Fatigue Management**

- Driver Management SOP (Rev. 001, dated 20 Jan 2026): maximum continuous driving of 4 hours with a mandatory minimum rest of 30 minutes; maximum daily driving of 8 hours; minimum weekly rest of 1 day.

**Load Security**

- Trailer Twist Lock SOP (Rev. 001, dated 20 Jan 2026) establishes twist lock procedures to prevent cargo shifting, verified during on-site inspection.

**Adverse Weather & Civil Unrest**

- Transport Disaster Recovery Plan (Rev. 001, dated 20 Jan 2026) defines severe weather conditions and prescribes driver action protocols, including the cessation and rerouting of all cyanide transport.

**Drug Abuse Prevention**

- Driver Health & Welfare programme documented in the Driver Management SOP; random drug screening conducted between Jan and Dec 2025, with clinic analysis verified on 17 Feb 2025.

**Record Retention**

- Records Retention SOP (Rev. 001, dated 20 Jan 2026) mandates a minimum retention period of three (3) years for all transport-related records.

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*Standard of Practice1.5:*

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

The operation is ☑ in full compliance with Standard of Practice1.5

☐ in substantial compliance with

☐ not in compliance with

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

| |
|---|
| CFA's ICMI certification scope is limited to land transportation activities. The transportation of cyanide by sea or air is outside the scope of CFA's operations and, accordingly, this practice is not applicable.<br>CFA does not conduct, arrange, or subcontract any sea or air transportation of cyanide. |

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*Standard of Practice 1.6:*

*Track cyanide shipments to prevent losses during transport.*

The operation is
- ☑ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 1.6

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

CFA has implemented a robust shipment tracking and communication framework to prevent cyanide losses during transport. The following objective evidence was reviewed and verified:

**Communication Capability**

- All drivers maintain communication via mobile phones throughout the transport route. Given the short distance between Capitol Warehouse and Westport Terminal, no signal blackout areas have been identified along the route.

**GPS Tracking Records**

- Fleet Monitoring SOP (Rev. 001, dated 20 Jan 2026) governs the GPS tracking protocol using the Gussman tracking system.
- Sample GPS records reviewed: FC 33_BPQ 6206 – Westport to Capitol, 5 Feb 2026 (0820–0831 hrs); FC 14_BJG 6117 – Capitol to Westport, 7 Dec 2025 (1116–1123 hrs).

**Inventory Controls & Chain of Custody**

- Cargo Move System (Port Klang cargo lodging system) captures real-time inventory and chain of custody data for all cyanide shipments.
- Sample reviewed: Container No. TLLU 2801659, Request for Transport dated 9 Nov 2025 – documenting shipment details between shipper/consignee, forwarding agent, and container operator.

**MSDS & Pre-Delivery Documentation**

- Safety Data Sheet (SDS) – Sodium Cyanide, UN No. 1689, version dated 17 Jul 2024, is available during all transportation activities.

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• Pre-delivery briefing verified on 5 Feb 2026, covering SDS review, prime mover/trailer connection checks, twist lock inspection, and tyre pressure verification.

CFA does not engage third-party contractors for land transportation activities.

## 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.*

The operation is
☑ in full compliance with
☐ in substantial compliance with
☐ not in compliance with
Standard of Practice 2.1

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

CFA's interim cyanide storage facility at Capitol Warehouse has been assessed and found to comply with the requirements for safe cyanide storage. The following objective evidence was reviewed and verified:

**Warning Signage**

- Warning signs are posted at the warehouse entrance in both Malay and English, communicating the presence of cyanide, prohibitions on smoking, open flames, eating and drinking, and mandatory PPE requirements.
- Reference: CIMAH (Control of Industrial Major Accident Hazards) Report – Jul 2025, Description of Process and Storage.

**Secondary Containment**

- The enclosed interim storage and repacking areas feature floor and wall infrastructure providing adequate secondary containment for truck trailers transporting packaged solid cyanide in Intermediate Bulk Containers (IBCs) and drums.

- ISOtainers and sea containers containing IBCs are designed for outdoor storage and do not require additional secondary containment.

The spill response SOP reviewed, addresses both dry and wet cyanide spill scenarios, specifying response capability thresholds: spills below 300 kg to be managed internally by the internal ERT; spills of 300 kg or above (or any wet spills) to trigger BOMBA Hazmat team activation. The SOP requires storage areas to have impermeable flooring, no nearby open drains, and adequate spill-containment capability, supported by dedicated spill kits. All spill response actions must follow customer-specific Emergency Response Guidance (ERG) and established protocols. Minor dry spills are managed internally, while major or wet spills require immediate escalation to external emergency services, with internal intervention strictly limited and no use of water permitted.

**Spill Kit**

The sodium cyanide spill kit inventory was verified against a detailed checklist [dated 14 Mar 2026] that included PPE (helmets, boots, SCBA, masks), response tools (shovel, scoops, tarpaulin, windsock), communication devices (walkie-talkies), and safety controls (cones, delineators). All items were checked for quantity and condition, with most marked as available and serviceable. Remarks were noted for specific items where applicable, indicating observation and control over readiness status.

**Segregation of Incompatible Materials**

- Cyanide is segregated from acids, oxidisers, and explosive materials through physical barriers including berms, bunds, and walls within the storage facility.

**Protection from Moisture**

- Solid cyanide is stored under roof cover and off the ground using specially designed containers, minimising exposure to moisture.

**Ventilation**

- The facility is equipped with adequate ventilation systems to prevent the accumulation of hydrogen cyanide (HCN) gas in the storage area.

**Access Control & Security**

- A dedicated security post staffed by contracted security personnel is in place at the facility entrance.
- A visitor access control system is operational, with all access to cyanide storage areas monitored and recorded.
- CCTV coverage for ISOtainers located in outdoor storage areas was reviewed and confirmed as overall surveillance of the site.

## Principle 3 | EMERGENCY RESPONSE

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

*Standard of Practice 3.1:*

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

The operation is
- ☑ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 3.1

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

CFA has developed and implemented a comprehensive Emergency Response Plan (ERP) addressing potential cyanide releases across both land transportation and interim storage operations. The following objective evidence was reviewed and verified:

**ERP Documentation**

- Transport Emergency Response Plan – SOP Project Safety Plan (Rev. 001, dated 20 Jan 2026) constitutes the primary ERP document, addressing potential cyanide release scenarios identified through risk assessment.

**Identified Incident Scenarios**

- Chemical spillage during land transportation
- Vehicle accidents during transit
- Loading and unloading accidents
- Fire at the interim storage facility

**ERP Coverage & Structure**

- Incident classifications (e.g., accidental sodium cyanide poisoning, spill to waterway) are mapped to corresponding incident response structures, accounting for the physical and chemical properties of the cyanide being transported.
- The ERP encompasses transport infrastructure considerations including road conditions, and integrates requirements for PPE, recovery vehicles, evacuation zones, and external responder communications.

- The ERP incorporates integration with local communities, medical facilities, local authorities, fire departments (BOMBA), and the cyanide supplier (Orica), including the ICMI Notification Process.

**Planned ERP Enhancements**

The ERP is being updated to formally document the following contextual elements: the designated transport route; physical and chemical form of cyanide transported; method of transport; condition of transport infrastructure (road, railway, port); and design parameters of the transport vehicle and interim storage facility.

*Standard of Practice 3.2:*

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

The operation is
- ☑ in full compliance with
- ☐ in substantial compliance with Standard of Practice 3.2
- ☐ not in compliance with

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

CFA has designated trained emergency response personnel and committed the necessary equipment and resources to support effective emergency response for both transportation and interim storage operations. The following objective evidence was reviewed and verified:

**ERP Training**

- Emergency Response Awareness Training conducted for all personnel involved in interim storage and cyanide transportation operations, covering activation of the ERP, equipment usage, and PPE requirements.
- Emergency and Critical Response Training for Cyanide and Other Hazards – training records reviewed and verified for relevancy and application.
- Hazmat Materials Training – conducted on 16 and 17 Dec 2025.

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**Roles & Responsibilities**

- Internal personnel are assigned specific emergency response duties for leakage and spillage scenarios, including initial containment actions, notification of local authorities, and minimisation of risk to people and the environment.
- External response roles are defined as follows:
  - Designated Hospitals – immediate emergency medical aid
  - Fire & Rescue (BOMBA) – fire suppression and extrication
  - Royal Malaysia Police – crowd and scene management
  - Department of Occupational Safety and Health (DOSH) – regulatory notification
  - Department of Environment (DOE) – notification in the event of cyanide release into waterways

**Emergency Equipment**

- Fleet Emergency Equipment verified: Safety Triangle, Torchlight, First Aid Kit, Safety Cones, and Delineators – present in all transport vehicles.
- Cyanide Emergency Spill Kit (Spill Kit N95, Soil Absorbent Pads, Self-Contained Breathing Apparatus) is pre-positioned at Capitol Warehouse and deployed when the Fleet Response Team is activated.
- Monthly PPE Inspection Form – Dec 2025: Safety helmet, safety goggles, and hand gloves inspected and verified.
- Cyanide Emergency Kit inspection verified for Mar 2026.

**Planned Enhancement**

- HCN detector has been incorporated into the Sodium Cyanide Spill Kit to strengthen response capability for gas exposure scenarios as part of the revised spill kit checklist [Rev 001]

CFA does not engage third-party contractors for land transportation activities.

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*Standard of Practice 3.3:*

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

The operation is ☑ in full compliance with ☐ in substantial compliance with ☐ not in compliance with Standard of Practice 3.3

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

CFA has established and maintains current emergency notification and reporting procedures for both internal and external stakeholders. The following objective evidence was reviewed and verified:

**Notification Procedures & Contact Information**

- Transport Emergency Response Plan SOP (Rev. 001, dated 20 Jan 2026) contains comprehensive contact information and step-by-step procedures for notifying all relevant parties in the event of an emergency during transportation, including the shipper, consignee, regulatory agencies, emergency services, medical facilities, and potentially affected communities.
- Contact lists are maintained and subject to review during annual ERP reviews or whenever a significant change occurs.

**Currency of Procedures**

- On-site interviews conducted with personnel confirmed familiarity with the ERP and associated contact lists, demonstrating effective communication and awareness of notification protocols.

**ICMI Incident Notification**

- A documented flowchart and management procedure is in place for the notification of ICMI in the event of a significant cyanide incident.
- On-site personnel interviews confirmed that no significant cyanide incident has occurred to date that required ICMI notification since the previous audit.

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*Standard of Practice 3.4:*

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

The operation is
- ☑ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 3.4

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

CFA has documented spill contingency and remediation procedures that are consistent with ICMI Code requirements. The following objective evidence was reviewed and verified:

**Remediation Procedures**

- Transport Emergency Response Plan SOP (Rev. 001, dated 20 Jan 2026) and the Orica Emergency Response Plan collectively define the spill contingency and remediation procedures applicable to CFA's cyanide operations.
- In the event of an accidental release, Orica is engaged to provide technical remediation support, including procedures for the recovery or neutralization of liquid solutions or solid cyanide, decontamination of affected soils and environmental media, and management and disposal of spill clean-up debris.

**Prohibited Chemicals for Surface Water Treatment**

The ERP explicitly prohibits the use of sodium hypochlorite, ferrous sulphate, and hydrogen peroxide for the treatment of cyanide released into surface water bodies, in accordance with ICMI Code requirements.

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

The operation is
- ☑ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 3.5

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

CFA has established a structured programme for the periodic evaluation and continuous improvement of its emergency response procedures and capabilities. The following objective evidence was reviewed and verified:

**ERP Review Provisions**

- The Transport Emergency Response Plan SOP (Rev. 001, dated 20 Jan 2026) mandates annual emergency drills as part of the ongoing ERP review cycle.

**Emergency Drill Records**

- Emergency Response Drill – conducted 17 Dec 2025, with scenario: minor solid sodium cyanide spill at roadside (ISOtainers, dry bulk, briquette form).
- Drill objectives evaluated:
  - Effectiveness of the Transport Fleet Response Team (FRT) response to a sodium cyanide leak
  - Zone control (Hot, Warm, Cold zones) and public safety management
  - Victim rescue, decontamination, and medical handover procedures
  - Neutralisation, waste handling, and cyanide testing protocols prior to site clearance

**Post-Drill Evaluation & Corrective Actions**

- Areas for improvement identified and formally documented following the 17 Dec 2025 drill:
  - Additional time to be allocated for proper PPE donning and doffing during emergency response
  - Department of Environment (DOE) notification requirement confirmed for spillages occurring on public roads.

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