

INTERNATIONAL CYANIDE MANAGEMENT CODE CYANIDE TRANSPORTER AUDIT

Anqing Shuguang Supply, Sales and Transportation Co. Ltd., Certification Audit Summary Audit Report

Submitted to:

International Cyanide Management Institute 888 16th Street, NW - Suite 303 Washington, DC 20006 UNITED STATES OF AMERICA Anqing Shuguang Supply, Sales and Transportation Co. Ltd., 106 Shuguang Road, Anqing, Anhui, 246003 PEOPLES REPUBLIC OF CHINA

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1.0 INTRODUCTION

1.1 Operational Information

Name of Transportation Company: Anging Shuguang Supply, Sales and Transportation Co. Ltd.

Name of Cyanide Manufacturer: Anhui Anqing Shuguang Chemical Co. Ltd.

Name of Responsible Manager: Mr Pan Kui, Vice-Manager, Shuguang

Address: 106 Shuguang Road, Anqing

State/Province: Anhui, 246003

Country: PEOPLES REPUBLIC OF CHINA

1.2 Description of Operation

Shuguang is a contracted forwarding agent for Anhui Anqing Shuguang Chemical Co., Ltd. (a manufacturer of cyanide) and responsible for road transportation of cyanide within China. The company has applied for ICMI transportation code authentication.

Approved by the Anhui Provincial Bureau of Transport and the Anhui Provincial Administration of Work Safety, Shuguang is engaged in the road transportation and handling of dangerous chemicals ("DC"). Shuguang is a designated enterprise for the road transportation of dangerous goods in Anhui Province.

Cyanide is packaged into timber boxes or steel drums by the cyanide manufacturer. The boxes and drums are loaded at the manufacturing site onto Shuguang trucks by the cyanide manufacturer. The trucks comprise enclosed trailers into which the boxes and drums area loaded. The trucks are sealed by Shuguang's truck driver. The trucks then depart directly for the customer site. The driver and the receiver confirm the integrity of the seal and then remove the seal together. The receiver then unloads the truck. The truck then returns to Shuguang.

There are two drivers per truck. The drivers work in 4 hour shifts. The resting driver will sleep in a bed compartment in the truck while the second driver drives the truck. The trucks do not stop on the way to the delivery site. The truck drivers may stop the truck to rest during the return journey when the trucks are empty.

Shuguang has been transporting cyanide since 1995. Each of the 10 customers has been supplied in the last year and has been supplied by Shuguang for at least one year as of December 2012.

Currently Shuguang undertakes transport of cyanide via 10 road transportation routes, all of which are in China. The destinations are summarized in Table 1.

Table 1: Shuguang's Cyanide Transport Destinations

Destination	Distance from Anqing (km)
Erenhot Warehouse for DC.1	1,984
Hangzhou Railway Station (North) ²	464
Hefei Railway Station ³	170
Shanghai Deepwater Port Warehouse (or Gangcheng DC Warehouse).	601
Kunming Guandu District Warehouse No.262	2,408
Xingyi Bishan Road Distributor Warehouse	2,084

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Destination	Distance from Anqing (km)
Shenyang Dongyao Factory	1,963
Jinan Licheng District Huaxing Warehouse	819
Jinjiang Luoshanhoulin Village Distributor Warehouse	879
Nantong Xianzhengda Factory	576

Notes:

- 1. The cyanide is transported from Erenhot Warehouse via Mongolia Railway transportation to Boroo Mine in Mongolia. The railway transportation is not managed by Shuguang.
- 2. The cyanide is transported by China Railway Transportation to Urumqi DC Warehouse, then to Alataw Pass and then via Kazakhstan Railway Transportation to Kumtor Mine. The railway transportation is not managed by Shuguang.
- 3. The cyanide is transported by China Railway Transportation to Urumqi DC Warehouse, then to Alataw Pass and then via Kazahstan Railway Transportation to Kumtor Mine. The railway transportation is not managed by Shuguang.

The best routes determined by Shuguang for the 10 above-mentioned cyanide transportation routes are all established highways, which is in accordance with the approved transportation routes from the governmental traffic management department. In addition, each route has been prepared with an alternative in case of emergency.

The cyanide transportation undertaken by Shuguang is all by road. All of the trucks involved during transport are owned and managed by Shuguang. All of the truck drivers are employees of Shuguang.

1.2.1 Transit Storage

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. At no stage is cyanide removed from the trucks or containers prior to unloading at customer sites or transit warehouse or shipping port.

Anging Shuguang Supply, Sales and Transportation Co. Ltd.

20 March 2013

Name of Transport Business

Signature of Lead Auditor

Date





1.3 Auditor's Findings and Attestation

Anqing Shuguang Supply, Sales and Transportation Co. Ltd. is:				
☑ in full compliance with				
С	in substantial compliance with			
not in compliance with				
the International Cyanide Mana	agement Code			
Audit Company:	Audit Company: Golder Associates			
Audit Team Leader:	Tom Carmichael, RABQSA (14544)			
Email:	tomcarmichael@golder.com.au			
1.4 Name and Signature Auditor				

1.4 Name and Signature Auditor

Name	Position	Signature	Date
Tom Carmichael	Lead Auditor and Technical Specialist	76	20 March 2013

1.5 Dates of Audit

The Certification Audit was undertaken over three days (3 person-days) on 4, 5 and 6 December 2012.

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.

Anging Shuguang Supply, Sales and Transportation Co. Ltd.

7.6

20 March 2013

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Date





2.0 CONSIGNOR SUMMARY

2.1 Principle 1 – Transport

The Code requires the consignor to "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.				
	$oxed{oxed}$ 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:

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

Shuguang has developed and implemented a procedure to guide the selection of transport routes to minimise the potential for accidents and releases or the potential impacts of accidents and releases. Shuguang has implemented the procedure and conducted route surveys for the selected routes. For each route, Shuguang has also identified a suitable alternative route for use in case of unacceptable conditions along the primary route.

Hazards identified during the route survey are risk assessed using a numerical risk scoring method. Once risk assessed, prevention and/or protective measures are identified and implemented to make the resulting risks more acceptable.

Shuguang has developed a procedure requiring annual route surveys and obtains feedback on route conditions from drivers.

Shuguang has documented measures taken to address risks identified with the selected routes within the Cyanide Transport Route Assessment Reports.

Due to the location of the routes in well developed areas of China and the structure of China's emergency response system Shuguang has not been required to undertake direct consultations with governmental agencies in the selection of routes and development of cyanide management measures. It should be noted that each cyanide transport activity is subject to approval by the government and the approval process involves consideration of the transport route and potential risks.

Security escorts are not required along the transport routes due to their location in well developed areas and the low security risks. Shuguang advised that during 17 years of cyanide transport operations it had not experienced any significant security issues.

Cyanide is delivered as required throughout the year, typically in single truck transports.

In the event of an incident, primary emergency response is coordinated by Shuguang with assistance as required provided by China's government emergency response services (police, ambulance, traffic authorities, hospitals and EPA).

In the event of an incident, the duties of primary responders include immediate notification to government authorities and medical facilities (as necessary). The roles of China's public responders (police, ambulance and fire brigades) are defined in legislation.

Shuguang does not use subcontractors within the scope of this audit.

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2.1.2 Transport Practice 1.2

Ensure that personnel ope with minimum risk to com			pment can perform their jobs		
	⊠ in full compliance	e with			
The operation is	in substantial com	pliance with	Transport Practice 1.2		
	not in compliance	with			
Summarise the basis for the	nis Finding/Deficienc	ies Identified:			
Shuguang is in FULL COMP handling and transport equip environment.			that personnel operating cyanide to communities and the		
Shuguang uses dedicated S cyanide in accordance with 0			and vehicle licences to transport		
	potential for cyanide	releases and exposures	een trained to perform their jobs in . The training of cyanide handling		
All drivers hold licences issu hazardous chemicals such a		vernments authorising th	em to drive trucks carrying		
2.1.3 Transport Pra	actice 1.3				
Ensure that transport equi		the cyanide shipment			
	⊠ in full compliance	e with			
The operation is	in substantial com	pliance with	Transport Practice 1.3		
	not in compliance	with			
Summarise the basis for the	nis Finding/Deficienc	ies Identified:			
Shuguang is in FULL COMP suitable for cyanide shipmer	•	rt Practice 1.3 requiring	that transport equipment is		
Shuguang only uses equipment designed and maintained to operate within the cyanide loads it will be handling. Equipment consists of road vehicles (truck – semi-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 well within the legal capacities of the public roads.					
The storage compartment of	the trucks has been o	constructed according to	the capacity of the trucks.		
Shuguang has implemented a monthly, quarterly and annual vehicle maintenance program as well as a maintenance request program for breakdowns. In addition to the workshop maintenance, the truck drivers conduct an inspection of all prime movers and trailers prior to departure, during stops along the journey and upon return to Anqing.					
Shuguang undertakes emergency response and training of Shuguang drivers.					
All trucks and trailers used be and approval by government		de transport are subject	to annual maintenance inspections		
		7 /			
Anging Shuguang Supply, Sales an	d Transportation Co. Ltd.	1. 6	20 March 2013		
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2.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.					
, and the second					
	in full complianc	e with			
The operation is	in substantial com	pliance with	Transport Practice 1	.4	
	$\hfill \square$ not in compliance	with			
Summarise the basis for the	nis Finding/Deficienc	cies Identified:			
Shuguang is in FULL COMP implement a safety program			the operation develop	and	
Shuguang has procedures to of the producer's packaging over point, prior to unloading	These comprise che				
Shuguang transports cyanid containers are labelled in ac required by local regulations drivers who have received tr	cordance with the Inte or international stand	ernational Maritime Dang ards. As a control mea	erous Goods (IMDG) sure, the cyanide is tr	Code and as ucked by	
Shuguang has implemented	a safety program for	cyanide transport that inc	cludes:		
Vehicle inspections;					
Preventative maintenar	nce;				
Limitations on operator	or drivers' hours;				
Procedures to prevent	loads from shifting;				
 Procedures to modify o encountered; and 	r suspend transport if	conditions such as seve	re weather or civil unr	est are	
Drug abuse prevention					
2.1.5 Transport Pra					
Follow international stand	ards for transportation	on of cyanide by sea ar	nd air.		
	in full compliance	ce with			
The operation is	in substantial con	npliance with	Transport Practice 1	1.5	
	not in compliance	e with			
Summarise the basis for the	nis Finding/Deficiend	cies Identified:			
Transport Practice 1.5 requiring the operation to follow international standards for transportation of cyanide by sea and air is NOT APPLICABLE to Shuguang.					
Shuguang does not transport consignments of cyanide by sea or air within the scope of this audit. Consignments of cyanide transported by Shuguang are loaded onto the trucks by the manufacturer in Anqing, which is Code certified cyanide producer. As a Code certified cyanide producer, the manufacturer has systems in place to ensure its containers are labelled in accordance with the International Maritime Dangerous Goods (IMDG) Code and as required by local regulations or international standards.					
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2.1.6 Transport Practice 1.6

	oxtimes in full compliance with	
The operation is	in substantial compliance with	Transport Practice 1.6
	not in compliance with	
Cummariae the basis t	ior this Finding/Deficionsies Identified.	

Summarise the basis for this Finding/Deficiencies Identified:

Track cyanide shipments to prevent losses during transport.

Shuguang is in FULL COMPLIANCE with Transport Practice 1.6 requiring the operation track cyanide shipments to prevent losses during transport.

All vehicles have communications systems that include cell phones and a GPS tracking system for trucks.

Communication equipment is tested as part of a pre-start check to ensure it functions properly. The GPS tracking system signal is used continuously and is transmitted from each truck throughout the trip.

Shuguang has not identified any cell phone communication blackout areas along transport routes.

The GPS tracking system continuously transmits position and other data from each truck throughout the trip.

Shuguang implements chain of custody procedures to prevent loss of cyanide during shipment. The driver conducts inspections of the containers at the departure point and at the conclusion of each break. Once delivered, a customer representative signs a form acknowledging that the consignment was received in good condition and unopened. Seal numbers on the trucks are recorded upon departure and arrival and checked to ensure that the seal has not been disturbed during transport.

Shipping papers and Material Safety Data Sheets accompany each cyanide convoy.

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2.2 Principle 2 – Interim Storage

The Code requires that the consignor "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.				
	oxtimes in full compliance with			
The operation is	in substantial compliance with Transport Practice			
	not in compliance with			
Summarise the basis for	this Finding/Deficiencies Identified:			
Transport Practice 2.1 requ	uiring transporters design, construct and op	perate cyanide trans-shipping depots		

Transport Practice 2.1 requiring transporters design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures is NOT APPLICABLE to Shuguang. Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. At no stage is cyanide removed from the trucks or containers prior to delivery to the customer.

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2.3 Principle 3 – Emergency Response

The Code requires that the consignor "Protect communities and the environment through the development of emergency response strategies and capabilities".

	ore princing or or or going	, respense en alegie	o anta capanimico :	
2.3	.1 Transport Pr	actice 3.1		
Pre	pare detailed Emergen	cy Response Plans f	or potential cyanide re	eleases.
		⊠ in full compliand	e with	
The	operation is	in substantial con	npliance with	Transport Practice 3.1
		not in compliance	with	
Sun	nmarise the basis for t	his Finding/Deficiend	cies Identified:	
	iguang is in FULL COMF ergency Response Plans			the operation prepare detailed
for o		ithin China. The inforr		nse for potential cyanide releases in an Emergency Response Plan
	Emergency Response I ween Anqing and the 10			based on road transportation
tran		e route evaluation prod	cess, route hazard/risk a	onsider relevant aspects of the assessment process, and accenarios:
	Breakdown on highway	/S.		
	Breakdown on general	roads.		
	Traffic accidents.			
	Spills in parking lots.			
	Spills in mountainous a	areas.		
	Spills to rivers.			
	Spills on bridges.			
	Spills in tunnels.			
facil		plans were not develo		of the transport vehicle. Storage stored at an interim storage facility
acti		ne anticipated emerge	ncy situation. External	ude descriptions of response responders identified in the
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	ne of Transport Rusiness		Signature of Lead Audi	





2.3.2 Transport Practice 3.2

Designate appropriate resp	oonse personnel and response.	d commit necessary res	sources for emergend	Cy		
	⊠ in full compliand	ce with				
The operation is	in substantial con	npliance with	Transport Practice 3	.2		
	not in compliance	e with				
Summarise the basis for th	nis Finding/Deficiend	cies Identified:				
Shuguang is in FULL COMP response personnel and com				ite		
Shuguang provides emerger training course to all new driv				a 9 day		
Refresher training is also probasis.	ovided to drivers, com	prising 2 hours delivered	twice per month on a	rolling		
Records of the completed tra	aining attendance regi	isters and training assess	sments were viewed fo	r 2012.		
The Emergency Response F personnel for the specific sceresponsibilities Shuguang dr provides additional detail of t	enarios. Descriptions ivers are detailed with	of the specific emergend of the Emergency Responsi	cy response duties and onse Plan. The cyanid			
Shuguang maintains a list of transport route. The equipm				uring the		
Shuguang does not use sub-	contractors within the	scope of this Audit.				
2.3.3 Transport Pra	actice 3.3					
Develop procedures for int	ernal and external e	mergency notification	and reporting.			
⊠ in full compliance with						
The operation is	in substantial con	npliance with	Transport Practice 3	.3		
	not in compliance	e with				
Summarise the basis for th	nis Finding/Deficienc	cies Identified:				
Shuguang is in FULL COMP internal and external emerge			that they develop proc	edures for		
The Emergency Response F shipper, the receiver/consign						
The Emergency Response F Emergency Response Plan i		nication flow chart and co	ontact numbers. A copy	y of the		
Shuguang has procedures in	place to ensure the o	contact numbers are kep	t current.			
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2.3.4 Transport Practice 3.4

Develop procedures for remo	ediation of release reatment.	es that recognise the ac	dditional hazards o	f cyanide		
	⊠ in full complian	ce with				
The operation is	in substantial cor	mpliance with	Transport Practic	e 3.4		
	not in compliance	e with				
Summarise the basis for this	s Finding/Deficiend	cies Identified:				
Shuguang is in FULL COMPLIANCE with Transport Practice 3.4 requiring that it develops procedures for remediation of releases that recognise the additional hazards of cyanide treatment.						
Shuguang has procedures for remediation, such as recovery or neutralisation of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris.						
The Emergency Response Platreatment of spills. A copy of the						
The training program also confidrivers receive this training year		for remediation dependir	ng on the spill. All S	huguang		
Shuguang's Emergency Response Plan prohibits the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water.						
2.3.5 Transport Prac	ctice 3.5					
Periodically evaluate respon	se procedures and	d capabilities and revis	e them as needed.			
⊠ in full compliance with						
The operation is	in substantial cor	mpliance with	Transport Practic	e 3.5		
	not in compliance	e with				
Summarise the basis for this	s Finding/Deficiend	cies Identified:				
Shuguang is in FULL COMPLIANCE with Transport Practice 3.5 requiring the operation periodically evaluate response procedures and capabilities and revise them as needed.						
The Emergency Response Plan and Emergency Response Programs contain provisions for periodically reviewing and evaluating the Plans' adequacy. The Plans were prepared in mid 2012 so have not yet required review.						
The Emergency Response Plan contains provisions for conducting mock drills and they are being implemented.						
Seventy six Shuguang employ 17 November 2012. Attendand plan includes the details of em site Emergency Response Tea	ce records, a descr ergency response p	iption of the drill plan and processes. As part of the	d photographs were	kept. The drill		
The drill scenario comprised a ambulance authorities. Photogand personnel in coveralls, glo	graphs showed poli	ce blocking off the roadv	ay around a cyanid	e delivery truck		
Anging Chuguang Curath, Calar and I	Trononortotics Co. 144	76		20 Moreh 2042		
Anging Shuguang Supply, Sales and The Name of Transport Business	TIANSPORATION CO. LTG.	Signature of Lead Audi	tor	20 March 2013 Date		





The Emergency Response Plan contains provisions for conducting a review after an incident.

The Emergency Response Plan also requires the emergency documents to be updated after an accident.

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7.4

Tom Carmichael ICMI Lead Auditor, Associate

TC/EWC/gf

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APPENDIX A

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