April 2010

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INTERNATIONAL CYANIDE MANAGEMENT CODE CYANIDE TRANSPORTATION AUDIT

Bolloré Africa Logistics - Burkina Logistics Mining Services, Burkina Faso, Certification Audit, Summary Audit Report

Submitted to:
International Cyanide Management Institute (ICMI)
888 16th Street, NW - Suite 303
Washington, DC 20006
UNITED STATES OF AMERICA

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REPORT

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Golder Associates

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Bolloré Africa Logistics	Christian Devaux	097643487 002 R Rev 0	30 March 2010	Electronic

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1.0 SUMMARY AUDIT REPORT FOR CYANIDE TRANSPORTATION OPERATIONS

Name of Transportation Facility:	Burkina Logistics Mining Services.
Name of Facility Owner:	Burkina Logistics Mining Services.
Name of Facility Operator:	Burkina Logistics Mining Services.
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2.0 LOCATION DETAIL AND DESCRIPTION OF OPERATION:

2.1 Background

2.1.1 Bolloré Africa Logistics and SDV

The Bolloré Group was founded in 1822. From its historic beginnings in thin papers, the Group has set about diversifying its product ranges and services. It is now a player in plastic films for capacitors and packaging, electric batteries, thin papers, transportation in Africa (freight forwarding and stevedoring, railways) and international Logistics, fuel distribution and dedicated terminals and systems.

The Africa transportation arm of the Group is managed by Bolloré Africa Logistics which has been established for more than 50 years in 41 countries. The company has established some 200 agencies and is a key player in port activity, terrestrial transport and tailor-made logistics solutions. Bolloré Africa Logistics is actively expanding its integrated logistics network in Africa and is now the biggest transport and logistics operator in Africa.

SDV Burkina Faso is a subsidiary of Bolloré Africa Logistics based in Ouagadougou. SDV Burkina Faso conducts:

- Air- and sea freight forwarding
- National & international transport
- Customs brokerages
- Container management
- Lift-handling
- Warehousing

2.2 Burkina Mining Logistics Services

Burkina Logistics Mining Services (BLMS) is a new subsidiary of Bolloré Africa Logistics and was formed in July 2008 to service the developing mining industry within Burkina Faso. The company specialises in:

- Transport and logistics of dangerous reagents
- Crane hire

BLMS conducts the transport of hazardous goods for SDV Burkina Faso and operates out of their office in Burkina Faso.

2.3 Sodium Cyanide Transportation

At the time of the audit, BLMS was actively engaged in the transportation of cyanide along the following routes:

- Port of Tema, Ghana to the Dry Port of Ouagadougou, Burkina Faso
- Dry Port of Ouagadougou, Burkina Faso to Semafo's Mana Mine, Burkina Faso

Delivery to Semafo's Mana Mine commenced in May 2008 and typically consists of eight containers each month.

The solid cyanide delivered by BLMS is manufactured and packaged into intermediate bulk containers (IBCs) within freight (shipping) containers by Tae Kwang Industrial Co, Ltd. A maximum of 20 IBCs are packed into a freight container with a maximum gross weight of 28 tonnes.

Semafo contracts Samsung as the international transporter to coordinate the transport the cyanide from Tae Kwang Industrial Co, Ltd to the Port of Tema, Ghana. Semafo then contracts BLMS to transport the cyanide from the Port of Tema to its final destination at Semafo's Mana Mine.

2.4 Transit Storage

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. Storage in transit does occur at the Port of Tema while formalities such as customs clearance and carrier releases are performed. Once formalities are complete, the cyanide containers are collected from the Port of Tema and delivered to Semafo's Mana Mine in Burkina Faso, via the dry port of Ouagadougou, Burkina Faso. At no stage is cyanide removed from the trucks or containers prior to unloading at customer mine sites.

SUMMARY AUDIT REPORT
AUDITORS FINDINGS

BLMS is:

☒ **in full compliance with**

☐ in substantial compliance with

☐ not in compliance with

The International Cyanide Management Code

Audit Company:	Golder Associates
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		29 April 2010

Dates of Audit:

The Certification Transport Audit was undertaken within three days (three person-days) between 23 February 2010 and 25 February 2010.

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.

Burkina Logistics Mining Services		29 April 2010
Name of Facility	Signature of Lead Auditor	Date

PRINCIPLE 1 – TRANSPORT

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

Transport Practice 1.1: Select cyanide transport routes to minimise the potential for accidents and releases.

The operation is
- ☒ **in full compliance with**
- ☐ in substantial compliance with **Transport Practice 1.1**
- ☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

BLMS, through its parent company Bolloré Africa Logistics 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. The procedure prompts the persons undertaking the survey to consider a number of hazards along the route. BLMS has implemented the procedure and conducts route surveys for the selected routes.

The survey is undertaken by a Driver and Escort Leader. The information is collated by the Commercial and Operations Manager and incorporated and validated by the QHSE Manager in a route hazard analysis DT539 in accordance with Bolloré Africa Logistics procedure DT.514. The data is risk assessed in accordance with Bolloré Africa Logistics procedure DT.509 and summarised into route specific assessments highlighting risk areas and detailing management measures for individual routes.

Ghana and Burkina Faso have a designated north-south commercial route travelling from Tema Port in Ghana to the container dry port in Ouagadougou, Burkina Faso. This commercial route was selected as the most appropriate route to deliver cyanide to existing customers within Burkina Faso.

BLMS has implemented a procedure requiring annual route surveys and has a process of obtaining feedback on route conditions after each convoy.

BLMS has documented measures taken to address risks identified with the selected routes.

The DT.538 procedure requires BLMS to define the control measures to manage the identified risks and detail the control measures within a MAN.blms.001.

BLMS has consulted as necessary with stakeholders and applicable governmental agencies in the selection of routes and development of cyanide management measures.

Convoys are used as a means of managing the risks of the road conditions and responding to emergencies. Each convoy is escorted by two escort vehicles (front and rear) that transport the equipment necessary to manage anticipated emergency events.

In the event of an incident, primary emergency response is coordinated by BLMS. The duties of primary responders include immediate notification to government authorities and medical facilities (as necessary). The Ghana and Burkina Faso public responders do not have a direct role in incident management outside of their normal duties and BLMS has consequently limited their consultation.

BLMS does not subcontract any of its cyanide transport operations within the scope of this audit.

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.**

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Transport Practice 1.2**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

BLMS 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.

BLMS only uses trained and competent operators to drive its trucks. BLMS has dedicated drivers that have appropriate training and vehicle licences to transport cyanide. BLMS maintains a database of vehicle licences that is checked on a daily basis by the Logistics Assistant. As an additional check, the Escort Leader also conducts a pre-departure check on the validity of licences prior to departure.

Ghana and Burkina Faso are both members of CEDEAO and drivers' licences issued in Burkina Faso are valid other CEDEAO member countries.

Ghana and Burkina Faso do not have any dangerous goods legislation, despite this, Hazardous Materials Training and Cyanide Awareness training of all cyanide drivers is provided by BLMS.

All personnel operating cyanide handling and transport equipment have been trained to perform their jobs in a manner that minimises the potential for cyanide releases and exposures. The training program developed by BLMS includes mandatory and optional training for all staff involved in cyanide transportation.

BLMS does not subcontract any of its cyanide transport operations within the scope of this audit.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Transport Practice 1.3**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

BLMS only uses equipment designed and maintained to operate within the loads it will be handling when transporting cyanide.

BLMS has 10 Kamaz prime movers dedicated to cyanide transportation. The Kamaz prime movers have a 6x4 configuration with a load capacity of 60 tonne. The Kamaz prime movers were purchased in 2008.

BLMS has dedicated three axle skeleton trailers manufactured by Nipon. The trailers have a rating of 60 tonne and are assigned to individual prime movers. The trailers were purchased in 2008.

All trailers dedicated to the cyanide delivery task are capable of carrying two fully loaded cyanide containers. No other load bearing equipment is used by BLMS.

BLMS has implemented a tiered maintenance program that is based on 5,000km intervals (OP 1-5000km, OP2-10,000km, OP3-15,000km, OP4-20,000km). The trailers also have a formal inspection sheet to prompt the maintenance activities every six and 12 months. The "OP4" Maintenance inspection includes visual observations on the prime mover for signs of stress and overloading. The trailers also have a formal inspection sheet to prompt the maintenance activities every six and 12 months. The Workshop Manager confirmed the trailer inspection includes a check for signs of stress and overloading.

Complementing the scheduled maintenance activities are pre and post journey inspections programs. These checks are recorded in the Mission Report and include observations on external condition of the vehicle. Where issues are identified during these inspections or en route, a Request for Repair process is initiated. Faults are noted on a card that is signed by the driver and confirmed by the mechanic. Once approved, a Maintenance Sheet is completed and registered into a maintenance database (GESPAR) and used to schedule maintenance activities.

On an annual basis, BLMS is also required to take all vehicles and trailers to the transport authority (CCVA) for a maintenance inspection.

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

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Transport Practice 1.4**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

BLMS is in FULL COMPLIANCE with Standard of Practice 1.4 requiring the operation develop and implement a safety program for transport of cyanide.

BLMS has procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging. These comprise checks at the port, along the route, border crossings and checks and the mine site prior to unloading.

Placards are used to identify the shipment as cyanide, as required by international standards. Procedures note any container of cyanide must be provided with a label of identification (indication of the contents: code danger and produced code: 1689). In the event of absence of this identification, the Escort Leader must affix a replacement label prior to departure. After unloading at the mine, the Escort Leader removes placarding from the container. Hazardous Materials training provided by BLMS covers international placarding.

BLMS has implemented a safety program for cyanide transport that includes:

- Vehicle inspections;
- Preventative maintenance;
- Limitations on operator or drivers' hours;
- Procedures to prevent loads from shifting;
- Procedures to modify or suspend transport if conditions such as severe weather or civil unrest are encountered; and
- Drug abuse prevention.

BLMS does not subcontract any of its cyanide transport operations within the scope of this audit.

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

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Transport Practice 1.5**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

BLMS does not transport consignments of cyanide by sea or air within the scope of this audit.

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

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Transport Practice 1.6**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

BLMS 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 BLMS, the mining operation, the cyanide producer and emergency responders.

The following communication equipment is used by the convoy:

- Trucks – cell phone, GPS tracking system and radios.
- Convoy escort vehicle - cell phone, GPS tracking system and satellite phone and radios.

Two way radios are used for internal convoy communication. The Escort Leader uses the cell phone to communicate with external responders and BLMS. The satellite phone is used in the event that the cellular network is not working.

Communication with the supplier and mine site is via email or telephone from the BLMS Commercial and Operations Manager.

Prior to the departure of the convoy, all communication equipment is tested including the battery charger.

BLMS has identified communication blackout areas along transport routes. The availability of the GSM network along a route is checked as part of the route assessment process.

The Commercial and Operations Manager advised that a cellular network exists along the current routes and communication is largely by cell phone. The satellite phone is used in the event that the cellular network is not working. Information from the GPS tracking system is transmitted via satellite not the GSM network.

All BLMS trucks are equipped with an Atrams GPS tracking device allowing BLMS to continuously track the convoy.

BLMS implements chain of custody procedures to prevent loss of cyanide during shipment. Once the containers are loaded onto the trucks at the Port, the Escort Leader conducts a visual inspection of the containers to ensure they are intact and undamaged. All containers are held in place on the vehicles using

twist locks and speed limits are enforced throughout the journey. Customs officials check the presence of seals and cross check the seal number against the container number listed on the Way Bill.

The Convoy Leader conducts a visual inspection of the twist locks and seals at the conclusion of each break to confirm they are intact prior to restarting the journey.

A Way Bill is carried on each truck. Once delivered a mine site representative signs the Way Bill acknowledging that the consignment was received in good condition and unopened. All completed documentation including the signed Way Bill is compiled in the Mission Report.

BLMS does not subcontract any of its cyanide transport operations within the scope of this audit.

PRINCIPLE 2 – INTERIM STORAGE

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

Transport Practice 2.1: **Store cyanide in a manner that minimises the potential for accidental releases.**

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Transport Practice 2.1**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Standard of 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 BLMS.

Wit Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. Storage in transit does occur at the Port of Tema but this is not the responsibility of BLMS. At no stage is cyanide removed from the trucks or containers prior to unloading at customer mine sites.

PRINCIPLE 3 – EMERGENCY RESPONSE

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

Transport Practice 3.1: **Prepare detailed Emergency Response Plans for potential cyanide releases.**

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Transport Practice 3.1**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

BLMS has developed detailed documents to cover emergency response for potential cyanide releases for cyanide transportation within Ghana and Burkina Faso. The information is contained within MAN.blms.002 and route specific MAN.blms.001.

The MAN.blms.001 and MAN.blms.002 are based on road transportation Dry Port of Ouagadougou, Burkina Faso to Semafo's Mana Mine, Burkina Faso.

The plans are appropriate for the selected transportation routes and they consider relevant aspects of the transport infrastructure. The route evaluation process, route hazard/risk assessment process, and operational experience was used to identify four likely emergency scenarios:

The route evaluation process, route hazard/risk assessment process, and operational experience was used by BLMS to identify four likely emergency scenarios:

- Transport incident. The container is on the truck, intact with no spill or product release.
- Transport incident. The container is on the ground, intact with no spill or product release.
- Transport incident. The container is on the ground or on the truck with limited spill or product release.
- Transport incident. The container is on the ground or on the truck with major or complex spill or product release.

The plans consider the physical and chemical form of cyanide and design of the transport vehicle as well as the formation of HCN. Storage facility emergency response plans were not developed, as cyanide is not stored at an interim storage facility between the Port of Tema and the mine site destinations.

The MAN.blms.001 and MAN.blms.002 include descriptions of response actions, as appropriate for the anticipated emergency situation. External responders identified in the documents are aware of their role in an emergency.

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:

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

BLMS has developed and implemented a training program for its drivers and escort personnel. The training program developed by BLMS includes mandatory and optional training for all staff involved in cyanide transportation.

Records of the annual completed training were viewed.

Descriptions of the specific emergency response duties and responsibilities for BLMS Drivers and the Escort team are detailed within the MAN.blms.002 and the IT.blms.003. These documents detail four emergency response guides to be followed in the event of an incident involving cyanide and the duties and responsibilities of key individuals.

DT.blms.006 contains a checklist of emergency response equipment necessary for each convoy. The Checklist is completed by the Escort Leader prior to the departure of the convoy.

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:

BLMS is in FULL COMPLIANCE with Standard of Practice 3.3 requiring that they develop procedures for internal and external emergency notification and reporting.

Emergency response contact numbers are detailed on DT.blms.010 and BLMS and mine site customer contact numbers are detailed on DT.blms.011. Both documents are located in the trucks and escort vehicles.

IT.blms.006 identifies the procedure for contacting stakeholders and emergency responders for each of the four identified emergency scenarios.

MAN.blms.001 contains procedures to ensure that internal and external emergency notification and reporting procedures are kept current. In addition to the formal review process, DT.blms.002 requires the Escort Leader to note any observed changes in contacts and respective telephone numbers during each convoy.

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:

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

BLMS 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.

Section 12 of MAN.blms.001 and Section 13 of MAN.blms.002 include information on the neutralisation procedure using sodium hypochlorite. More detailed neutralisation procedures specific to the anticipated scenarios are included within IT.blms.003.

BLMS prohibit the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water. This is emphasised in Section 12 of MAN.blms.001 and IT.blms.003.

Cyanide Awareness and Mock drill training also contains requirements for remediation depending on the spill and prohibits the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water.

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:

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

Section 2 of the MAN.blms.001 contains provisions for periodically reviewing and evaluating the Plan's adequacy and ensuring they are being implemented. The revision dates are indicated on the relevant documents.

Section 4 of MAN.blms.001 contains provisions for conducting Mock Drills. The training program requires these drills to be conducted every six months. On 6 and 13 January 2009, six emergency scenarios were conducted en route to the Mana Mine site. On 14 November 2009, four additional emergency scenarios were conducted at the transport depot. The scenarios were aligned with the scenarios identified by BLMS within the emergency documentation.

Within MAN.blms.002, the response actions detailed for each of the anticipated emergency scenarios includes a requirement for BLMS to review the emergency documentation.

Bolloré Africa Logistics also has an incident and accident reporting and investigation procedures (DT506 and DT507) requiring the emergency documents to be updated after an accident.

Report Signature Page

GOLDER ASSOCIATES PTY LTD

Ed Clerk
ICMI Lead Auditor and Transport Specialist, Associate and Manager Mining Environmental Services Group

EC/ST/lgs

A.B.N. 64 006 107 857

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APPENDIX A

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LIMITATIONS

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