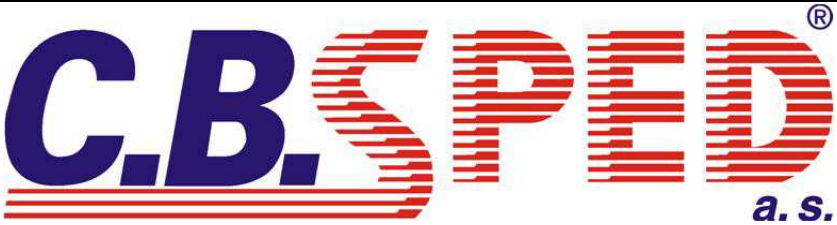
ICMI International Cyanide Management Code Transportation Summary Certification Audit Report



Ceske Budejovice
Czech Republic

Submitted to:
International Cyanide Management Institute
1400 I Street, NW – Suite 550
Washington, DC 20005
USA

2012 Audit Cycle

www.mss-team.com

Company Information:

Name of Operation Audited:	C.B. SPED a.s.
Name and contact information for C.B. SPED Contact:	Jan Čermák J.S. Baara 80 370 21 Ceske Budejovice Czech Republic Email: jcermak@cbsped.cz

Location detail and description of operation:

C.B. SPED is a located in Ceske Budejovice, a city located approximately two hours south of Prague, in the Czech Republic. C.B. SPED is a full-service trucking and 3rd-Party Logistics (3PL) Provider. The company achieved ISO 9001 certification in 2001 and ISO 14001 certification in 2005. C.B. SPED has been in operation since 1997 and has been transporting cyanide throughout Europe since 2000.

The cyanide that is used in the gold mining sector is transported in semi-bulk bag-in-box packaging using dry van trailers. The shipments originate in the Czech Republic and are bound for European customers and international destinations.

C.B. SPED is responsible for route determination, shipment tracking, truck inspections, preventive maintenance, training, safety program management, and emergency response planning. All of these activities and functions were reviewed during the certification audit. The ICMI-approved Transportation Auditor verified that C.B. SPED operations are in FULL COMPLIANCE with ICMC requirements for transporters.

Auditor's Finding

This operation is

☑ in full compliance
in substantial compliance *(see below)
not in compliance

with the International Cyanide Management Code.

Audit Company:	MSS Code Certification Service **www.mss-team.com**
Lead / Technical Auditor:	Nicole Jurczyk E-mail: **CodeAudits@mss-team.com**
Country and Language Auditing Resource:	Jiri Gavel
Date(s) of Audit:	January 26-27, 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 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.

C.B. SPED a.s.		September 10, 2012
Name of Operation	Signature of Lead Auditor	Date

C.B. SPED a.s.		September 10, 2012
Name of Operation	Signature of Lead Auditor	Date

1. TRANSPORT: ***Transport cyanide in a manner that minimizes the potential for accidents and releases.***

Transport 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
- not in compliance with

Transport Practice 1.1

Summarize the basis for this Finding:

C.B. SPED follows the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR) regulations. C.B. SPED and its subcontracted carriers have ADR experts who are responsible for ensuring that all ADR requirements are fulfilled. These experts perform the route and emergency response planning function to ensure the safe transport of hazardous material shipments in Europe.

Considerations such as population density, infrastructure (specifically tunnels), pitch and grade of roads, the proximity of the transport route to water bodies, and route security are considered during the planning process. Interviews were conducted with Dispatchers and with an ADR Transportation Expert. Awareness of the need for having a designated route and Security Plan was very good. Routing considerations were found to be consistent with those required by the International Cyanide Management Code (ICMC).

The only roads that are used for transport are formally designated by the European Union as being acceptable roads for the transport of Dangerous Goods. According to interviews, one risk mitigation measure employed by drivers is the use of truck stops that have been specifically designated as being appropriate resting areas for drivers transporting Dangerous Goods.

According to interviews, driver feedback is obtained during each delivery through the dispatch operation. Routes are reevaluated at least annually. Any problems or issues from the previous year and any changes to allowable truck stops and routes are taken into consideration during this annual review. Route planning information reviewed during the audit was most recently reviewed in 2012.

Risk mitigation measures to be taken by drivers are documented in the route-specific Security Plans. The routes traveled through Europe are generally considered safe. The driver is required to have the Security Plan available at all times during the transport. This practice was confirmed through interviews with the drivers and an evaluation of the paperwork that was available in the truck at the time of transport.

Dangerous Goods routes and truck stops are designated by each country in the European Union. This information is referenced by C.B. SPED during the designation of acceptable routes. Additionally, only hazmat routes allowed by the governments through which the load is transported are used, which ensures adherence to local requirements regarding hazardous materials. No parts of the routes present special or additional security concerns.

According to European law, the management of emergency transportation incidents is the responsibility of the Competent Emergency Authorities in each country. These Competent Emergency Authorities are supported by an extensive emergency response network of companies and responders known as ICE (International Chemical Environment). This European emergency response network of national programs has been chartered to provide information, advice, and emergency response resources to respond to transportation emergencies.

ICE was established by the European Chemical Industry. Each European country maintains country-level emergency response networks and resources and all countries work together to manage the emergency response actions for transportation incidents. The C.B. SPED shipments are made from the point of manufacture in the Czech Republic, to Germany, and then to Belgium.

ICE provides trained emergency responders to provide three levels of emergency response: Level 1 (remote product information and general advice), Level 2 (Advice from an expert at the scene), and Level 3 (Assistance with personnel and equipment at the scene of an incident). In this way, rapid and effective emergency response at the scene is assured for chemical shipments made in Europe.

In the Czech Republic the national emergency response network is called TRINS (Transport Information and Accident System). Emergency response to transportation emergencies involving chemicals is further supported directly by the Association of Chemical Industry of the Czech Republic - SCHP. The Cyanide consignor (Czech Republic Producer) is an ICMC certified Signatory company that maintains emergency plans for on-site and off-site emergency response, including transportation. The ICMI Certification Report dated March 24, 2011 details that the "External Emergency Response" procedures for these shipments were specifically included in the certification audit. Additionally, the Czech Producer (Lučební závody Draslovka, a.s. Kolín) is a member company of SCHP and would respond to any transportation incident involving their products. This information was confirmed through interview with the company's ICMC Coordinator.

In Germany, the emergency response network is known as TUIS. In Belgium, the emergency response network is called Belintra. The Czech Republic Cyanide Producer and the receiving warehouse in Antwerp interact with local emergency responders and hospitals. This was

confirmed through interviews with ICMC Coordinators at the Producer and the Antwerp warehouse.

C.B. SPED uses subcontract trucking companies for the transport of cyanide. Procedures and contractual agreements are in place to ensure that subcontract trucking operations fulfill all ICMC requirements. C.B. SPED maintains a formal list of approved cyanide transporters who have been evaluated by C.B. SPED for their ability to transport cyanide in a manner that fulfills all ICMC requirements. At the time of the audit, six companies had been evaluated by C.B. SPED and were being used for the transport of sodium cyanide between the Czech Republic and the Port of Antwerp. Relevant qualification information and contracts were evaluated for each of these subcontractor companies during the audit.

The procedure " Cyanide Control Plan for Sub-Contracted Transportation Operations" calls for an initial evaluation of transporters that confirms that drivers are appropriately qualified to transport hazard class 6.1 hazardous materials (ADR authorization), equipment is suitable for the transport of the loads it must carry (ADR equipment), that the sub-contractor performs a route risk evaluation process and issues emergency and security plans including emergency telephone numbers to drivers. ICMC requirements mirror ADR (European Transportation) regulations very closely. All ICMC considerations, including pre-trip inspections, emergency equipment being maintained on trucks, preventive maintenance, fitness for duty, limits on hours driven, etc. are included in European regulations. C.B. SPED monitors its sub-contractors at least annually through an auditing process to confirm that all ICMC requirements continue to be fulfilled. This evaluation is done using the " Cyanide Transportation Carrier Inspection Checklist".

Signed ICMC-related agreements, formal procedures that are part of the company's certified ISO 14001/9001 management system, transportation orders (contracts) with ICMC requirements stated in them, records of communications between C.B. SPED and its subcontract transportation partners, legal authorizations, shipping paperwork showing chain of custody requirements being met, shipping weight information, placard practices, subcontractor driver awareness, and subcontractor equipment suitability were evaluated during the 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
- not in compliance with

Transport Practice 1.2

Summarize the basis for this Finding:

C.B. SPED uses only trained, qualified and licensed drivers. The transport of Dangerous Goods is performed in accordance with the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR) regulations. These regulations require that drivers transporting Dangerous Goods undergo specific training, become authorized specifically for the hazard class that is being transported (6.1 for cyanide) and that the drivers receive periodic health examinations.

Training and driver qualification records were reviewed and were found to be acceptable. Drivers are trained by an external training organization (DEKRA) that is authorized to provide governmentally required Dangerous Goods training. The training is designed to train drivers to perform their jobs in a manner that minimizes the potential for chemical releases and exposures. According to interviews with the C.B. SPED Training Coordinator, drivers who transport cyanide are trained every five years, in accordance with ADR regulations.

C.B. SPED uses subcontract trucking companies for the transport of cyanide. Procedures and contractual agreements are in place to ensure that subcontract trucking operations fulfill all ICMC requirements. C.B. SPED maintains a formal list of approved cyanide transporters who have been evaluated by C.B. SPED for their ability to transport cyanide in a manner that fulfills all ICMC requirements. At the time of the audit, six companies had been evaluated by C.B. SPED and were being used for the transport of sodium cyanide between the Czech Republic and the Port of Antwerp. Relevant qualification information and contracts were evaluated for each of these subcontractor companies during the audit.

The procedure "Cyanide Control Plan for Sub-Contracted Transportation Operations" calls for an initial evaluation of transporters that confirms that drivers are appropriately qualified to transport hazard class 6.1 hazardous materials (ADR authorization), equipment is suitable for the transport of the loads it must carry (ADR equipment), that the sub-contractor performs a route risk evaluation process and issues emergency and security plans including emergency telephone numbers to drivers. ICMC requirements mirror ADR (European Transportation) regulations very closely. All ICMC considerations, including pre-trip inspections, emergency equipment being maintained on trucks, preventive maintenance, fitness for duty, limits on hours driven, etc. are included in European regulations. C.B. SPED monitors its sub-contractors at least annually through an auditing process to confirm that all ICMC requirements continue to be fulfilled. This evaluation is done using the " Cyanide Transportation Carrier Inspection Checklist".

Signed ICMC-related agreements, formal procedures that are part of the company's certified ISO 14001/9001 management system, transportation orders (contracts) with ICMC requirements stated in them, records of communications between C.B. SPED and its subcontract transportation partners, legal authorizations, shipping paperwork showing chain of custody requirements being

met, shipping weight information, placard practices, subcontractor driver awareness, and subcontractor equipment suitability were evaluated during the 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
- not in compliance with

Transport Practice 1.3

Summarize the basis for this Finding:

C.B. SPED uses tractor trucks and dry van trailers to transport solid sodium cyanide. Equipment files were reviewed and specifications for the tractor trucks and trailers were reviewed specifically for weight capacity. The weights of shipments on Bills of Lading (BOL) shipping paperwork were compared to equipment design specifications. The equipment used by C.B. SPED is capable of operating at loads greater than the heaviest shipment reviewed. Interviews and a review of ADR regulations confirmed that vehicles and equipment must be regularly maintained and inspected as part of the ADR equipment permitting process.

Trailers are loaded by the cyanide producer, an ICMC certified company. Trucking companies pick up loaded trailers. The trucks used to transport the cyanide are heavy-duty commercial tractors pulling trailers that are capable of handling loads that are significantly heavier than these shipments. ADR (European Transportation) regulations require that equipment that is authorized for the transport of hazardous materials meet fitness for duty requirements and that it be properly maintained and inspected. Authorities inspect equipment and confirm valid equipment certifications and proper loading practices commonly during road-side inspections throughout Europe.

An extensive review was conducted during the audit of shipping papers from a wide range of subcontracted companies. This review of shipping weights and number of packages confirmed that loads are always standard weights that have been predetermined by the shipper as being within equipment capability and legal road weight limits.

Procedures and contractual agreements are in place to ensure that subcontract trucking operations fulfill all ICMC requirements. C.B. SPED maintains a formal list of approved cyanide transporters who have been evaluated by C.B. SPED for their ability to transport cyanide in a manner that fulfills all ICMC requirements. At the time of the audit, six companies had been evaluated by C.B. SPED and were being used for the transport of sodium cyanide between the Czech Republic and the Port of Antwerp. Relevant qualification information and contracts were evaluated for each of these subcontractor companies during the audit.

The procedure " Cyanide Control Plan for Sub-Contracted Transportation Operations" calls for an initial evaluation of transporters that confirms that drivers are appropriately qualified to transport hazard class 6.1 hazardous materials (ADR authorization), equipment is suitable for the transport of the loads it must carry (ADR equipment), that the sub-contractor performs a route risk evaluation process and issues emergency and security plans including emergency telephone numbers to drivers. ICMC requirements mirror ADR (European Transportation) regulations very closely. All ICMC considerations, including pre-trip inspections, emergency equipment being maintained on trucks, preventive maintenance, fitness for duty, limits on hours driven, etc. are included in European regulations. C.B. SPED monitors its sub-contractors at least annually through an auditing process to confirm that all ICMC requirements continue to be fulfilled. This evaluation is done using the " Cyanide Transportation Carrier Inspection Checklist".

Signed ICMC-related agreements, formal procedures that are part of the company's certified ISO 14001/9001 management system, transportation orders (contracts) with ICMC requirements stated in them, records of communications between C.B. SPED and its subcontract transportation partners, legal authorizations, shipping paperwork showing chain of custody requirements being met, shipping weight information, placard practices, subcontractor driver awareness, and subcontractor equipment suitability were evaluated during the audit.

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

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

Transport Practice 1.4

Summarize the basis for this Finding:

Cyanide packages are loaded into C.B. SPED trailers by the shipper. C.B. SPED drivers confirm that the load has been properly secured after the cargo has been loaded. Appropriate placards are displayed on the trucks. According to interviews with the cyanide producer and the drivers, the proper use of placards is confirmed during the pre-trip inspections.

According to driver interviews, pre-trip inspections are conducted prior to each departure. Additionally, interviews with the cyanide producer also confirmed that trucks are visually inspected prior to each loaded truck being allowed to exit the production facility. Vehicles used for transportation of Dangerous Goods in Europe must meet certain technical specifications and must be regularly maintained. ADR vehicle technical certificates are issued for each piece of equipment (tractors and trailers). The vehicle certificates are renewed annually. C.B. SPED

equipment is maintained regularly, maintenance records were found to be acceptable and vehicle certificates were all within date and valid.

The Safety Program includes limitations on drivers' hours in accordance with ADR regulations. Drivers are informed of legal requirements, and are encouraged to stop driving if they become too tired (empowerment). Driver's hours are logged and are monitored to ensure regulatory compliance and adherence to company policy. Cyanide packages are loaded by the shipper. According to documented Safety Instructions, C.B. SPED drivers must confirm that the load has been properly secured after the cargo has been loaded.

Drivers are empowered and directed to pull over whenever weather, fatigue or other conditions are unsafe to continue the trip. The Security / Route Plan designates which truck stops are acceptable for stopping and resting during the transport. According to interviews, the drivers maintain close communication with the dispatcher and personnel at the point of delivery. If upset conditions arise, the driver would call the dispatcher to inform him or her of the situation.

Procedures and contractual agreements are in place to ensure that subcontract trucking operations fulfill all ICMC requirements. C.B. SPED maintains a formal list of approved cyanide transporters who have been evaluated by C.B. SPED for their ability to transport cyanide in a manner that fulfills all ICMC requirements. At the time of the audit, six companies had been evaluated by C.B. SPED and were being used for the transport of sodium cyanide between the Czech Republic and the Port of Antwerp. Relevant qualification information and contracts were evaluated for each of these subcontractor companies during the audit.

The procedure " Cyanide Control Plan for Sub-Contracted Transportation Operations" calls for an initial evaluation of transporters that confirms that drivers are appropriately qualified to transport hazard class 6.1 hazardous materials (ADR authorization), equipment is suitable for the transport of the loads it must carry (ADR equipment), that the sub-contractor performs a route risk evaluation process and issues emergency and security plans including emergency telephone numbers to drivers. ICMC requirements mirror ADR (European Transportation) regulations very closely. All ICMC considerations, including pre-trip inspections, emergency equipment being maintained on trucks, preventive maintenance, fitness for duty, limits on hours driven, etc. are included in European regulations. C.B. SPED monitors its sub-contractors at least annually through an auditing process to confirm that all ICMC requirements continue to be fulfilled. This evaluation is done using the " Cyanide Transportation Carrier Inspection Checklist".

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

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

Transport Practice 1.5

Summarize the basis for this Finding:

C.B. SPED does not ship cyanide by sea or by air. This section of the ICMC does not apply to the operation.

Transport 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

Transport Practice 1.6

Summarize the basis for this Finding:

C.B. SPED uses multiple GPS and communication systems to ensure that drivers are always able to communicate with dispatch personnel and others, as necessary. According to interviews, communication system function is confirmed during the pre-trip inspection process. In addition to GPS tracking, drivers update Dispatch personnel at defined frequencies to inform them of shipment status. Interviews with drivers, dispatchers, and management personnel and observations made during the audit confirmed this practice.

The communication equipment is in daily use. The proper functioning of equipment is checked during the driver pre-trip inspections. Blackout areas do not present a problem on the routes traveled. Drivers have shipping documentation including the Bill of Lading with them at all times during a shipment. Bills of Lading were reviewed for cyanide shipments made in 2011 and 2012. Information regarding the type of material transported, the type of container, the number of packages, and the weight of the shipment is consistently entered onto the Bill of Lading by the shipper. Drivers carry Safety Data Sheets with them during deliveries. This practice was confirmed through interview and an inspection of paperwork available during a delivery.

Trailers are sealed upon loading and are not opened by C.B. SPED. Shipping paperwork was reviewed and the seal numbers on containers and the weight of the shipment are confirmed at the

point of transfer of custody. Shipping paperwork was found to be conformant to Code requirements, including chain of custody requirements.

Procedures and contractual agreements are in place to ensure that subcontract trucking operations fulfill all ICMC requirements. C.B. SPED maintains a formal list of approved cyanide transporters who have been evaluated by C.B. SPED for their ability to transport cyanide in a manner that fulfills all ICMC requirements. At the time of the audit, six companies had been evaluated by C.B. SPED and were being used for the transport of sodium cyanide between the Czech Republic and the Port of Antwerp. Relevant qualification information and contracts were evaluated for each of these subcontractor companies during the audit.

The procedure " Cyanide Control Plan for Sub-Contracted Transportation Operations" calls for an initial evaluation of transporters that confirms that drivers are appropriately qualified to transport hazard class 6.1 hazardous materials (ADR authorization), equipment is suitable for the transport of the loads it must carry (ADR equipment), that the sub-contractor performs a route risk evaluation process and issues emergency and security plans including emergency telephone numbers to drivers. ICMC requirements mirror ADR (European Transportation) regulations very closely. All ICMC considerations, including pre-trip inspections, emergency equipment being maintained on trucks, preventive maintenance, fitness for duty, limits on hours driven, etc. are included in European regulations. C.B. SPED monitors its sub-contractors at least annually through an auditing process to confirm that all ICMC requirements continue to be fulfilled. This evaluation is done using the " Cyanide Transportation Carrier Inspection Checklist".

Signed ICMC-related agreements, formal procedures that are part of the company's certified ISO 14001/9001 management system, transportation orders (contracts) with ICMC requirements stated in them, records of communications between C.B. SPED and its subcontract transportation partners, legal authorizations, shipping paperwork showing chain of custody requirements being met, shipping weight information, placard practices, subcontractor driver awareness, and subcontractor equipment suitability were evaluated during the audit.

2. INTERIM STORAGE: ***Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.***

Transport 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

Transport Practice 2.1

Summarize the basis for this Finding:

This requirement is not applicable to the operation. C.B. SPED does not have any cyanide interim storage responsibilities. At the time of the audit C.B. SPED was not storing any cyanide. Cargo was being transported directly from the Cyanide Producer to customers and to customer or consignor warehouses in Europe.

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
- not in compliance with

Transport Practice 3.1

Summarize the basis for this Finding:

C.B. SPED has documented emergency response procedures for transportation accidents. Emergency preparedness documents were last revised in 2012 and were evaluated by the auditor. The information was found to be appropriately detailed. C.B. SPED drivers have emergency response procedures, the Safety Data Sheet, and emergency telephone numbers with them during all deliveries. C.B. SPED only transports cyanide via truck and all scenarios considered in the emergency planning documents were related to truck accidents or small cyanide spills from packaging. Solid sodium cyanide (the only physical form transported), roadway infrastructure differences, and the roles of emergency responders are discussed in the planning information.

The emergency response procedures and the security plans explain that the C.B. SPED drivers are to secure the scene by blocking public access to the accident scene. They are also to make notifications in the event of an emergency situation. The universal emergency response number to be used for a crash is 112. This number can be dialed in the European Union free of charge from any telephone or any mobile phone in order to reach emergency services. In addition to the 112 emergency number, the driver is to contact the transportation emergency response network ICE. The emergency numbers outlined in the emergency documentation are for TRINS in the Czech Republic, TUIS in Germany, and Belintra in Belgium. Each sub-contractor is required by ADR regulations to plan the route and emergency response information specifically for each delivery of hazardous goods. Drivers are required to have this in the truck during deliveries.

Transport 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
- not in compliance with

Transport Practice 3.2

Summarize the basis for this Finding:

All drivers receive emergency response training through a government-approved Dangerous Goods training program every five years. This training is required as part of the license renewal process and includes hands-on emergency response training. Additionally, C.B. SPED personnel (dispatchers and office personnel) are trained and refreshed on company emergency procedures a least annually. The information in the emergency and security plans was reviewed and was found to be appropriately detailed.

The emergency response procedures and the security plans explain that the C.B. SPED drivers are to secure the scene by blocking public access to the accident scene. They are also to make notifications in the event of an emergency situation. The universal emergency response number to be used for a crash is 112. This number can be dialed in the European Union free of charge from any telephone or any mobile phone in order to reach emergency services. In addition to the 112 emergency number, the driver is to contact the transportation emergency response network ICE. The emergency numbers outlined in the emergency documentation are for TRINS in the Czech Republic, TUIS in Germany, and Belintra in Belgium. Each sub-contractor is required by ADR regulations to plan the route and emergency response information specifically for each delivery of hazardous goods. Drivers are required to have this in the truck during deliveries.

European ADR regulates what emergency response equipment must in a truck at all times during the transport of Dangerous Goods. Emergency equipment that was evaluated during the audit included the following equipment: portable ABC fire extinguisher, wheel chocks, warning signs, personal protective equipment (goggles, gloves, boots, chemical suit), a tarp, spill equipment, eye rinse, emergency vest, flashlight, shovel, and bucket.

Driver awareness of the need to regularly inspect the equipment as part of the pre-trip inspection process and have it available at all times was excellent. Additionally, interviews indicated that government authorities check for this equipment during routine truck stops and inspections. Penalties apply to drivers who do not have the equipment with them during transport.

All drivers receive emergency response training through a government-approved Dangerous Goods training program every five years. This training is required as part of the license renewal process and includes hands-on emergency response training. Additionally, C.B. SPED personnel

(dispatchers and office personnel) are trained and refreshed on company emergency procedures a least annually.

Spill equipment is maintained in the trucks. The condition and availability of the equipment is checked during the pre-trip inspection. Driver awareness of the need to regularly inspect the equipment as part of the pre-trip inspection process and have it available at all times was excellent. Government authorities check for this equipment during routine truck stops and inspections. Penalties apply to drivers who do not have the equipment with them during transport. According to Safety Instructions dated 11/20/2003, C.B. SPED drivers must confirm that the emergency response equipment is available during transport. No checklist is used, but records of the pre-trip inspection are maintained by the driver in the driver log.

Procedures and contractual agreements are in place to ensure that subcontract trucking operations fulfill all ICMC requirements. C.B. SPED maintains a formal list of approved cyanide transporters who have been evaluated by C.B. SPED for their ability to transport cyanide in a manner that fulfills all ICMC requirements. At the time of the audit, six companies had been evaluated by C.B. SPED and were being used for the transport of sodium cyanide between the Czech Republic and the Port of Antwerp. Relevant qualification information and contracts were evaluated for each of these subcontractor companies during the audit.

The procedure " Cyanide Control Plan for Sub-Contracted Transportation Operations" calls for an initial evaluation of transporters that confirms that drivers are appropriately qualified to transport hazard class 6.1 hazardous materials (ADR authorization), equipment is suitable for the transport of the loads it must carry (ADR equipment), that the sub-contractor performs a route risk evaluation process and issues emergency and security plans including emergency telephone numbers to drivers. ICMC requirements mirror ADR (European Transportation) regulations very closely. All ICMC considerations, including pre-trip inspections, emergency equipment being maintained on trucks, preventive maintenance, fitness for duty, limits on hours driven, etc. are included in European regulations. C.B. SPED monitors its sub-contractors at least annually through an auditing process to confirm that all ICMC requirements continue to be fulfilled. This evaluation is done using the " Cyanide Transportation Carrier Inspection Checklist".

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Transport 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

Transport Practice 3.3

Summarize the basis for this Finding:

The notification procedures, including current telephone numbers, are described in the route-specific Security Plan that is carried by drivers at all times. The documents were reviewed during the audit and found to be appropriately detailed. According to interviews the Security Plans are reviewed at least annually and are updated as necessary.

Transport 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

Transport Practice 3.4

Summarize the basis for this Finding:

According to European law, the managing of emergency transportation situations is the responsibility of the Competent Emergency Authorities in each country. These Competent Emergency Authorities are supported by an extensive emergency response network of companies and responders known as ICE (International Chemical Environment). This European emergency response network of national programs has been chartered to provide information, advice, and emergency response resources to respond to transportation emergencies.

ICE was established by the European Chemical Industry. Each European country maintains country-level emergency response networks and resources and all countries work together to manage emergency response to transportation incidents. The C.B. SPED shipments are made from the point of manufacture in the Czech Republic, to Germany, and then to Belgium. ICE provides trained emergency responders to provide three levels of emergency response: Level 1 (remote product information and general advice), Level 2 (Advice from an expert at the scene), and Level 3 (Assistance with personnel and equipment at the scene of an incident). In this way, rapid and effective emergency response at the scene is assured for chemical shipments made in Europe.

In the Czech Republic the national emergency response network is called TRINS (Transport Information and Accident System). Emergency response to transportation emergencies involving chemicals is further supported directly by the Association of Chemical Industry of the Czech Republic - SCHP. The Cyanide consignor (Czech Republic Producer) is an ICMC certified Signatory company what maintains emergency plans for on-site and off-site emergency response, including transportation. The ICMI Certification Report dated March 24, 2011 details that the "External Emergency Response" procedures for these shipments were specifically included in the certification audit. Additionally, the Czech Producer (Lučební závody Draslovka, a.s. Kolín) is a member company of SCHP and would respond to any transportation incident involving their products. This information was confirmed through interview with the company ICMC Coordinator.

In Germany, the emergency response network is known as TUIS. In Belgium, the emergency response network is called Belintra.

C.B. SPED is not authorized to remediate spilled materials. The cyanide and the spilled materials are owned by the consignor. Remediation activities are coordinated through the ICE. Emergency response procedures prohibit the use of cyanide treatment chemicals to treat cyanide that has been released into surface water. C.B. SPED is not authorized and/or trained to remediate cyanide spills to any media. Remediation is managed through each European's Competent Authority for emergency response to transportation incidents.

Transport 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

Transport Practice 3.5

Summarize the basis for this Finding:

The emergency procedures are reviewed as necessary, and contact information is reviewed at least annually. All documentation reviewed as part of this evaluation was updated in 2012. The emergency plan states that an emergency drill is conducted at least annually. A record was available to show that an emergency response drill had been conducted, reviewed for performance, and that no changes to the written plan were deemed necessary after the drill.