# International Cyanide Management Code.

# Coleman Transport, Walvis Bay.
# Cyanide Transportation Certification Audit.

# Summary Audit Report

Report submitted to:-
1400 I Street, NW, Suite 550
Washington. DC 20005
United States of America.

Report of:-
Coleman Transport Walvis Bay
2426 Moses Garoëb St,
Walvis Bay.
Namibia.

# COLEMAN TRANSPORT SUMMARY AUDIT REPORT

## 1.0 INTRODUCTION.

## 1.1 Operational Information.

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| Name of Transportation Facility: | Coleman Transport Walvis Bay Depot. Namibia |
| Name of Facility Owner: | Coleman Transport, Windhoek. Namibia |
| Name of Facility Operator: | Coleman Transport, Windhoek. Namibia |
| Name of Responsible Manager: | Mr. Johan Oosthuizen |
| Address: | 2426 Moses Garoëb St,<br>Walvis Bay. |
| State/Province: Country: | Walvis Bay. Namibia. |
| Telephone:<br>Fax:<br>E-Mail: | +264 64 221 105/7<br>+264 64 221 106<br>oosie@coleman-transport.com |

**Walvis Bay Depot.**

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| Physical address | 2426 Moses Garoëb Street, Walvis Bay. Namibia |
| Telephone number | +264 64 221 105 / 7 |
| Fax | +264 64 221 106 |
| E-mail address | oosie@colemantransport.com |

**Head Office.**

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|---|---|
| Physical address | Plot 30, Emmerentia<br>Brakwater. Windhoek<br>Namibia. |
| Telephone number | +264 84 000 9100 |
| Fax | +264 84 000 9112 |
| E-mail address | tom@coleman-transport.com |
| Website | www. coleman- transport.com |

## 1.2 Description of Operation – Coleman Transport.

### 1.2.1 Company Profile.

The provision of road transport and logistics solutions between South Africa and other neighbouring Southern African countries to and from Namibia is greatly facilitated by services provided by the private sector. This is especially the case with specialised transport services associated with mining operations in many of these countries. The success of large national and multinational mining and other industrial sector companies in Southern Africa is heavily dependent on reliable transport and logistics solutions and services to ensure the mines are continuing to operate successfully. These mines require experienced road transport operators, especially those that deliver a high quality, skilled and flexible service with outstanding customer service.

One such company is Coleman Transport, which has over twenty years' experience in transporting a variety of standard load and custom load goods between South Africa, other neighbouring Southern Africa and Namibia. Coleman Transport is a privately owned company with Black Economical Empowerment (BEE) credentials - both in Namibia and South Africa.

With humble beginnings in 1993 the company has grown to become the road cargo transport and logistics solution of choice for mining companies in most parts of Namibia requiring the inward transport of necessary consumables, spares and bulk goods and the local transport of final product and hazardous material.

Many years of experience in the transport industry enables the Company to offer highly tailored and expanded services to companies in Namibia and international large multi-national companies with operational footprints into most of the Southern African Region.

The company has its headquarters in Windhoek with depots in Rosh Pinah, Tsumeb and Walvis Bay. In South Africa they do have depots at Springbok, Gauteng and Cape Town.

The Coleman Transport Depot is situated at number 2426 Moses Garoëb St, Walvis Bay, Namibia with their Head Office been based in Windhoek, Namibia.

Coleman Transport is a road Transport Company, registered with the Namibian Department of Transport which transports various types of products (classified and low hazard) in Namibia as well as to and from neighbouring countries. The vehicles are registered with the authorities as carriers of classified/ Dangerous (category "D") and general cargo (category "G")

Coleman Transport is comprehensively equipped with a wide range of well-maintained transportation equipment and vehicles. To ensure a high quality, efficient and prompt service, the average age of the fleet is maintained at three years and new vehicles are purchased every two years.

The transporter has entered into a contract with the Consignee (B2 Gold mine) for the transportation of packed sodium cyanide in briquettes in freight containers from the Port of Walvis Bay to the end user B2Gold (also called Otjikoto mine) situated close to Otavi, approximately 509 kilometres from Walvis Bay in Namibia.

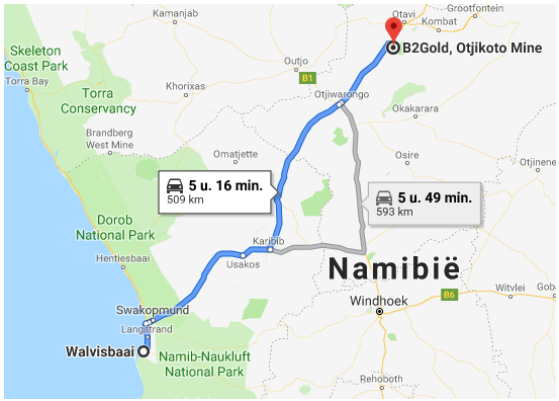
In terms of the business contract between Coleman Transport (the operator) and the Consignor / Consignee, Coleman Transport is operating as an individually certified road transporter and no sub-contractors are utilised to assist with the transportation of any of the freight containers loaded with Sodium Cyanide.

All of the dedicated truck tractors and trailers are owned by Coleman Transport. The truck tractor drivers are full time employed by the transporter with average of 5 years experience in driving of heavy vehicles.

The maintenance of vehicles still under warranty are kept and such records are kept with the dealership and those which are been fully paid for are kept at the depot in Walvis Bay. During the audit no overdue services of any of their vehicles (truck tractors and trailers) were noted. Maintenance records and documentation were found to be updated and properly filed.

Truck tractors and trailers, when not in use, are stalled within a properly fenced off depot yard in Walvis Bay from where they are dispatched to the port of Walvis Bay where freight containers are loaded onto the trailers. Only one container per trailer loaded. The loading of the freight container are done by the Port Authority. The consignment departs directly from there to the Consignee's premises.

Travelling distance from Walvis Bay to Consignee's premises can be done with daylight. For this reason night driving is absolute prohibited. .




*Coleman Transport*
*Name of facility*

*Signature of Lead Auditor*

*9th July 2019*
*Date*

The movement of vehicles are controlled by utilising a tracking system which is monitored from the Coleman Transport Head Office based in Windhoek, the tracking Company itself as well as from the Deport Manager's cellular phone in Walvis Bay.

De-stuffed Sodium Cyanide freight containers are returned to the Walvis Bay Port where it is off-loaded and forwarded to the Cyanide manufacturer. No nominally empty freight containers are or will be stacked at the transporter's depot.

### 1.2.2 Road transportation.

Coleman Transport is contracted to B2 Gold mine to transport sodium cyanide briquettes packed in freight containers from the port of Walvis Bay in Namibia to the Otjikoto Gold mine owned by B2 Gold which is approximately 509 km north of the country's capital, Windhoek and 39 kilometres from the town of Otavi.

A pre-certification audit was conducted at the Coleman Transport depot on 13th to 15th February 2017. The first convoy was done on 16th July 2018. Upon arrival of the consignment of cyanide at the Walvis Bay port, the off-loading of the containers is performed under the management of the port authority, Namport. Coleman collets the containers within 24 hours of arrival and transports the containers to the Consignee's premises where it is off-loaded by the mine's logistical department.

A maximum of six (6) vehicles plus a convoy leading vehicle forms a convoy. Client insists on a pilot vehicle to be supplied by the transporter. In the event of an accident the emergency team supplied by Navachab mine, is deployed to the scene.

### 1.2.3 Transit storage.

Coleman Transport does not operate cyanide-shipping depots or interim storage facilities. Freight containers containing cyanide are collected from the Port of Walvis Bay and transported directly to the B2 Gold mine site. In the event of inclement weather such as sandstorms, the collecting of containers will be postponed until such time as the weather has improved. Should such weather be experienced whilst on route, the convoy is parked at a safe parking area on route until wind or storm has subsided. Convoy leader reports the situation to the Depot Manager.

## 1.3 Defining of acronyms and/or abbreviations.

- RRA, Route Risk Assessment
- SDS, Safety Data Sheet also known as Material Safety Data Sheet (MSDS)
- SADC, Southern African Developing Corporation
- SABS, South African Bureau of Standards.
- SANS, South African National Standard
- SLA Service Level Agreement
- SOP Standard operating procedure.
- COF, Certificate of fitness
- IMDG, International Maritime Dangerous Goods Code.
- ERP, Emergency Response Plan
- EMRP, Emergency Management Response Plan
- ER, Emergency Response
- MSDS Material Safety Data Sheet for the product
- PPE Personal Protective Equipment
- HCN gas Hydrogen Cyanide gas.
- BEE Black Economic Empowerment
- AGR Australian Gold Reagent.
- PrDP Professional Drivers Permit.

# COLEMAN TRANSPORT SUMMARY AUDIT REPORT

## 1.4 Auditor's Findings.

This operation is

**X in full compliance**
□ in substantial compliance
□ not in compliance

with the International Cyanide Management Code.

❖ For cyanide transportation operations seeking Code certification, the Corrective Action Plan to bring an operation in substantial compliance into full compliance must be enclosed with this Summary Audit Report. The plan must be fully implemented within one year of the date of this audit.

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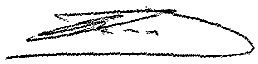
|---|---|
| Audit Company: | T.B. Müller South Africa |
| Audit Team Leader: | T.B. Müller |
| E-mail: | tommieb.muller@gmail.com |
| Names and Signatures of Other Auditors: | None |
| Date(s) of Audit: | Audit was conducted from **4th to 7th March 2019** |

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.

| Name | Position | Signature | Date |
|---|---|---|---|
| T.B. Müller | Lead auditor. |  | 9th July 2019 |

# COLEMAN TRANSPORT SUMMARY AUDIT REPORT

***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.*

| | **X in full compliance with** | |
|---|---|---|
| The operation is | □ in substantial compliance with | Transport Practice 1.1 |
| | □ not in compliance with | |

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

Transport practice 1.1 requiring cyanide routes are selected to minimise the potential for accidents and the release of product. Coleman Transport has implemented a procedure for the selection of primary and secondary transport routes to identify potential accidents or the potential impacts of accidents and releases. This procedure requires that all possible routes from the Port of Walvis Bay to the end user must be evaluated. RRAs on primary and secondary routes were conducted and observations have been documented.

During the RRAs on both the selected routes, various potential hazard types such as the condition of the road surface, the pitch of the road, potholes, trees, stray animals, traffic on the roads and through towns, pedestrians, fog, smoke, sand, rail tracks, rivers, bridges, sand storms, etc have been evaluated and noted in the assessment documents. Recommended preventative actions to mitigate or eradicate the risks on selected routes are included in RRA assessment document. RRA procedure found to be in place and approved.

Procedure “Transport Management Plan” outlines the process for the development and subsequent annual review of the detail captured in the route risk assessments. Procedure was approved by Company Management and AGR.

External responders (police and emergency services and Hospitals (medical facilities)) along the route who will play a role during an emergency, were met. During these meetings Coleman Transport sought the inputs from these institutions regarding routes that may be followed. Proof of such visits was noted. Product SDS handed to each of the emergency services.

Procedure “Route Risk Assessments” compiled and implemented to regularly evaluate and re-evaluate the risks on both the primary and secondary routes that the cyanide consignment will travel on. Further procedure requires that the identified risks be captured and managed. Procedure was approved by Company Management of which copies were forwarded to Consignor.

Clause 4.5 of procedure states that the process for selecting transport routes and conducting of RRAs be re-evaluated on at least an annual based.

In accordance with the requirements as stipulated in the aforementioned procedures Route Risk Assessments have been conducted and findings / observations recorded on RRA summary. Extra precautionary measures that are to be taken by the drivers whilst on route are included on RRA summary under the heading "additional precautions to be taken". RRA’s were approved by Company Management.

Namibian legislation do not require an escort vehicle to lead a convoy when transporting cyanide, however due to the demand from the Consignee the transporter agreed to respect this requirement. Transporter make use of a light delivery vehicle equipped with all the required emergency equipment that will be needed during an unwanted event. (Spill kit and first aid kit are available).

Prior to departure from depot to Consignee via the Port of Walvis Bay, a briefing session is held with escort leader and drivers. During this session the route that need to be followed, the identified risks and the recommended precautionary measures that are to be taken, been discussed.

On route the escort leader communicates via cellular telephone with the driver about the condition or risks noted. Visa versa communication applies.

Truck tractors and escort vehicle is fitted with cell phone chargers to ensure constant fully charged batteries.

In accordance to de-briefing procedure number CT.SOP.it is a requirement that during the de-briefing session, the escort leader will be given the opportunity to report on areas of concern on the route or areas that, according to him, being unsafe to travel.

On route between Walvis Bay and the Consignee, the emergency services and other external responders entered into a mutual agreement for latter to render a service in case of an emergency situation. Their roles were explained to them.

Coleman Transport does not subcontract any of the cyanide transport activities. Various clauses in the Transport Management Plan prohibit the utilisation of subcontractors for the transportation of cyanide. Clauses noted by auditor.

During drivers annual medical examination done by a registered medical practitioner the use of drugs and alcohol consumption is tested. This is done besides all the other medical tests that are to be performed. Fitness certificates are provided to the employer ensuring that their alcohol and drug screening medical is clear. Random alcohol checks are done on employees including the drivers and escort leader. Subjecting for alcohol testing for escort leader and drivers is compulsory prior to leaving the depot. Alcohol screening is also done at the Walvis Bay Port before access will be allowed. .

***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.*

| | **X in full compliance with** | |
|---|---|---|
| The operation is | □ in substantial compliance with | Transport Practice 1.2 |
| | □ not in compliance with | |

Summarize the basis for this Finding/Deficiencies Identified:

Drivers employed as dangerous goods drivers must be older than 25 years of age. Namibian legal requirement and such driver must be medically fit for the duty.

Transporter only uses drivers who are legally licensed to operate the category vehicle that transports cyanide, who is in possession of a valid Professional Heavy Duty Driver Category PrDP “D” (Dangerous Goods) and well trained on the cyanide procedures. PrDP “D” is renewed every two years. On applying for a PrDP, in terms of the Namibian Authorioties, drivers must be in possession of a valid vehicle driver’s license, a valid Dangerous Goods Training Certificate as well as a recent medical certificate.

Namibia has adopted the South African requirements for driver involved in the transportation of classified goods, as no such legislation exists in Namibia. This is a SADC agreement. Drivers have attended and passed their dangerous goods training course as required by the South African National Road Traffic Act and the SABS code of practice number SANS 10231:2014 and medically fit to operate..

Dangerous goods training for drivers transporting classified goods are required to attend and pass dangerous goods training course (practical and theoretical) which must be presented by and approved and registered training institution. Training of such is an annual requirement. Certificates as well as training course material available and sighted. Divers have also attended and passed their 2 yearly level 1 basic first aid training course. Training and legal requirements for drivers are included in an Excel spreadsheet-based training matrix.

Drivers are not directly involved in the physical loading and or off-loading of containers. Once container has been loaded onto the skeletal trailer, the driver ensures that the container is properly secured to the trailer by engaging all four twist locks.

Coleman Transport do not outsource any of the cyanide transport activities to sub-contractors. The outsourcing of any cyanide transport activities to sub-contractors is prohibited. Various clauses in the Transport Management Plan refers to this.

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

| | **X in full compliance with** | |
|---|---|---|
| The operation is | □ in substantial compliance with | Transport Practice 1.3 |
| | □ not in compliance with | |

Summarize the basis for this Finding/Deficiencies Identified:

Technical specifications including vehicle power, axle mass loading and other parameters are set for truck tractors and skeletal trailers. Specifications are recorded in "Overload procedures" with reference number CT.SOP.060. Truck tractors and trailers are manufactured against these specifications. Truck tractors are maintained according to manufacturer's specs as well as in accordance to SANS (South African National Standards) Codes 10231-1:2014. Skeletal trailers are serviced once per month as per "Company's preventative maintenance procedures" with truck tractors been serviced every 30 000 kilometres.

This transporter only utilises equipment designated and maintained to transport consignments of cyanide loads. A minimum of seven vehicles have been identified with which the transportation of cyanide from the Walvis Bay Port to B2Goldmine is handled..

Daily pre-trip checks done on vehicles prior to departing from depot. On an annual basis the Namibian Government requires a Certificate of Fitness (CoF) to be issued for all truck tractors and trailers. The CoFs are issued by a Governmental department, the Namibian Transport Information and Regulatory Services (NaTIS). This forms part of the vehicle registration renewal process. CoF's for truck tractors and trailers are done. Original documents kept at Coleman Transport's Head Office in Windhoek with copies thereof available at the depot in Walvis Bay.

The trailer manufacturer's rating of the loading capacity of such transport equipment is rated at max mass of 32 000 Kg which is adequate as a container packed with sodium cyanide has a mass of max 22 000 Kg. Procedures to verify the adequacy of the equipment for the load it can bear in use. Only one 6 meter container will be loaded onto a trailer. Should two containers (44 000 KG) be loaded on a trailer, the loaded mass will exceed the manufacturer's load-bearing limit of 32 000 Kg per trailer.

Preventative and maintenance procedure requires that drivers to daily conduct a pre-trip check before transport departs from depot. It is a requirement that both driver and Operations clerk endorses the pre-trip checklist.

Regular servicing of truck tractors and trailer are done. No overdue servicing was noticed. Vehicles out of warranty period are serviced in accordance to the manufacturer's requirements.

Procedure to prevent overloading of the transport vehicle being used for the handling cyanide in use. Once freight container have been stacked and secured onto a skeletal trailer, vehicle combination is weighed at the Governmental weigh bride to ensure no overloaded vehicle goes out on the road.

Coleman Transport does not subcontract any of the cyanide handling or transport activities.

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

| | **X in full compliance with** | |
|---|---|---|
| The operation is | □ in substantial compliance with | Transport Practice 1.4 |
| | □ not in compliance with | |

Summarize the basis for this Finding/Deficiencies Identified:

The transporter has procedures to ensure that packaged Sodium Cyanide stacked in freight containers, is transported in a manner that maintains the integrity of the producer's packaging. Placards are used to identify the shipment as cyanide. A clause in the "Loading procedure" refers to the checking of the integrity and condition of the container prior to loading at the Walvis Bay Port, to ensure that the seals are still intact, seal numbers and container number corresponds with that on shipping documentation, split placards are visibly displayed on all four sides of the freight container and the physical condition of the container ensuring that it is fit to be transported.

Should any discrepancy of the aforementioned noted, container is not allowed to be loaded onto trailer.

Container lowered onto the trailer, the applying of the twist locks into locking position thereby ensuring proper securing of the container with the twist locks into locking position.

Transport signage format and styling dictated by the Namibian Government Notice number 156 of the Labour Act of1992, Regulation number 177 that refers to the labelling of transport vehicles transporting of hazardous substances, requires format to be in line with recommendations of the United Nations, read in conjunctions with the requirements of the IMDG code of practice and the South African Codes of Practice, SANS code 10232-1:2007.

Freight containers will be placarded with split placards on all four sides. Split placards will consist of the UN number of the product, the primary hazard class diamond and secondary hazard class diamond (if applicable). Loading procedure requires that once freight container has been loaded onto the trailer and before departure on route, the applying of the twist locks into locking position thereby proper securing of the container with the twist locks into the locking position. An orange warning diamond sign displayed to the front of the cab of the truck tractor.

Orange diamond remains displayed and removed once container is off-loaded. Placards remain on the container until containers are unpacked and decontaminated.

Truck tractors are serviced by manufacturer or latter's agent at 30 000 km intervals with a 2 000km variance both sides. Trailers are serviced every month by an in-house mechanical workshop. The transporter's vehicle preventative and maintenance program was found to be sound and sufficient to ensure the safe transportation of the cyanide. Any maintenance or servicing done on a vehicle is documented and filed on the respective vehicle's file.

Coleman Transport implemented a vehicle safety program for cyanide transport that includes the following: -

a) Transporter has a drug and alcohol policy that establishes a zero tolerance stance on the intake of alcohol and the use of drugs by employees when on duty.
b) Daily alcohol tests been conducted on operational staff members & visitors. Proof of such activity available at the Depot. Alcohol tests also conducted on drivers before cyanide transportation commences to ensure that they have no traces of alcohol in the system.
c) Pre-trip vehicle inspections are performed prior to the commencement of each journey. Findings and observations documented on checklists.
d) Transporter operates a preventative and services maintenance program.
e) Limitations on driving hours. (see paragraph referring to Drivers hours below.)
f) Securement of containers onto trailers is done by twist locks which are designed and constructed to international transport standards.
g) Responsibility been delegated to escort leader for ensuring that diversion from the approved route, is safe for the convoy to pass. Management to be informed in this case.
h) Drivers been subjected to annual medical screening conducted by an Occupational Health Practitioner to ensure driver fitness.
i) During pre-employment medical test applicants are subjected to a drug & alcohol test. Test results to be negative before employment contract is signed. Random selection of current drivers files were scrutinised and checked.
j) Random alcohol tests also been conducted after employee's lunch breaks.

Documentary evidence on the maintaining of the above, kept on file.

Sodium cyanide is stowed into freight containers by Consignor in Australia. Cyanide in briquettes are packed in waterproof polyethylene bags that has been heat sealed to provide a moisture barrier. This is enclosed in a woven polyethylene bag that is encased in a custom-designed strong wooden box. Box is placed on a pallet base to provide further protection during storage and transit. one-ton intermediate bulk containers for storage and transport.

"Fatigue Management procedure" and "Drivers Hours Policy" in place and enforced. Delivery destination is in a 12 hour travel distance. Legal requirements for driving hours in Namibia is not more than 14 hours in a 24 hour cycle. Driving hours are controlled from detail received from tracking system and escort leader's report.

The escort leader can suspend transhipment if any condition is been observed or prevails, which could cause interruptions of the transport convoy. Conditions such as road closures, road works, inclement weather, breakdowns and civil unrests can lead to the suspension of the movement of the convoy. Escort Leader procedure stipulates the responsibilities of the escort leader.

The escort leader to pass on information to the Transporter Management in Walvis Bay on any delays experienced en-route e.g. change in the planned routes, the temporary suspending of the transhipment of the cargo, etc.

Copies of such tests that have been conducted, noted. Results of drug & alcohol tests that have been performed on drivers noted. Medical certificates of three (3) identified drivers and escort leader found to be on their personal files and up to date. Medical test results reveal that test results to be negative. As an effective control measure, the Company reserves the right to carry out regular and random alcohol tests on any or all the employees. Heavy vehicle drivers will be subjected to an alcohol test before departing from the Depot

Procedure addressing the retention periods of documentation established as per Namibian and Company requirements. Hazardous Chemical Substances Regulation of the South African Occupational Health & Safety Act, Act 85 of 1993 requires that personnel files to be archived for a minimum period of 30 years.

Archived of documentation: -

a) Vehicle maintenance records for the life of the vehicle/s.
b) Personnel files for a minimum period of 30 years.
c) Commercial documents a minimum period of 5 years.
d) Cyanide record retention period 5 years.

Records archived off-site at transporter's Head Office based in Windhoek.

Coleman Transport do not outsource any of the cyanide transport activities to sub-contractors.

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

| | **X in full compliance with** | |
|---|---|---|
| The operation is | □ in substantial compliance with | Transport Practice 1.5 |
| | □ not in compliance with | |

Summarize the basis for this Finding/Deficiencies Identified:

Not applicable to this operation as no shipment of cyanide is done by sea and air.

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

| | **X in full compliance with** |
|---|---|
| The operation is | □ in substantial compliance with Transport Practice 1.6 |
| | □ not in compliance with |

Summarize the basis for this Finding/Deficiencies Identified:

The Transporter do have means to communication with the escort leader and drivers and vice versa using cellular phones. Escort leader / driver do not communicate with the Consignee. Only in case of an emergency the escort leader is allowed to contact the emergency responders. A Company cellular phone is allocated to the escort leader and the truck drivers.

Communication media are tested daily to ensure functionality as they are using it on a daily basis. Test procedure compiled and implemented. Prior to departing from the Depot, communication equipment checked during pre-trip inspections and during briefing sessions. Drivers also do have their personal cell phones as back-up.

During the conducting of the RRA, no communications blackout areas were identified.

Black-out zone procedure stipulates that should a black-out in communication be experienced, drivers and escort leader uses their two way radios to establish communication with one another. In the event of a cell communication break-down, drivers and escort leader been instructed to reduce speed and to close the distance between each convoy vehicle. This will ensure that the convoy vehicles are always in sight of one another. Escort leader report to Depot at the end of blackout area.

Coleman Transport has a tracking system to track the progress of the cyanide shipment.

All truck tractors are fitted with a tracking device (Scannia's own tracking system). System is manned 24/7. The Satellite Tracking System used for constant monitoring the movement of the consignment. This can be done from the Coleman Transport Control Room based in Windhoek, the Operator's Control office in Walvis Bay and on Managements cellular phones. System sighted and found to be operative.

The Ops Controller at random calls the escort leader on route to determine convoy position and compare that info with the image on the tracking system.

Transporter implemented inventory controls and a chain of custody documentation to prevent loss of cyanide during transportation.

Namibian legislation requires that documentation related to load be available in the designated space of the loaded vehicle. Vehicle carry a Tremcard, trip sheet, dangerous goods declarations, driver's hazchem training certificate, delivery document (including freight container detail, seal numbers and mass) and product SDS. A copy of the product SDS is available in the office of the office of the Depot Manager in Walvis Bay. Available product SDS found not to be "older" than 3 years as required by legislation.

Coleman Transport does not outsource any of the cyanide transport activities to sub-contractors.

## 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.

| | **X in full compliance with** | |
|---|---|---|
| The operation is | □ in substantial compliance with | Transport Practice 2.1 |
| | □ not in compliance with | |

Summarize the basis for this Finding/Deficiencies Identified:

Questions 2.101 to 2.106 are not applicable as any cyanide trans-shipment or interim storage of Sodium Cyanide will not be done on the Transporter's depot facility. Cyanide is loaded at Namport (Port of Walvis Bay) and off-loaded at the Consignee at B2Gold mining facility.

Containers loaded with Sodium Cyanide are loaded at Namport where after the convoy departs to the Consignee where it is off-loaded. No interim storage of Sodium Cyanide will be done at the transport depot.

Each freight container must be locked with a seal for the entire duration of the transport. Should it be found that there are signs of seal tampering, tampering with the container or that it is found that the seal have been removed, container will not be loaded.

Should inclement weather condition be experienced in Walvis Bay, product will not be loaded. On route, convoy will be diverted to either Windhoek or Tsumeb depot (whichever is the closest) where it will be kept until such time as the weather condition improved. At these depots the containers will not be off-loaded from the trailers. Consignment will be parked away from other vehicles. Employees at the depot will be informed to keep clear of this area. The area will be barricaded and applicable safety signage displayed.

If convoy is not close to Windhoek or Tsumeb, convoy will park off the road at a safe place and remain there till such time as weather condition have improved. Escort leader will inform depot in Walvis Bay.

Both these premises are Security guarded 24/7. Constant patrols on the sites is one of the security functions,

## 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.

| | |
|---|---|
| | **X in full compliance with** |
| The operation is | □ in substantial compliance with Transport Practice 3.1 |
| | □ not in compliance with |

Summarize the basis for this Finding/Deficiencies Identified:

Cyanide (in briquette form) will be transported by road stacked in freight containers. No product will, be transported by rail or air. Sodium Cyanide will enter Namibia through the port of Walvis Bay.

An "Emergency Preparedness and Spill Contingency Plan" for the handling of a cyanide (in solid form) off-site emergency situation have been developed. Copy is available at the transporter's office in Walvis Bay as well at their Head Office in Windhoek. The scope of this plan is to provide information to all role players (in and external responders) with regards to each responder's responsibility who will be involved in the primary stage of an emergency situation. A list of Emergency Contact numbers is included into the plan.

The transporter's Emergency Management Response Plan (EMRP) defines the roles that outside responders, medical facilities and or communities have to play during an emergency situation. A flow diagram clearly spells out the duties of each of the role players during an emergency situation.

The transporter has entered into a contract (SLA)(Service Level Agreement) with NAM Chemicals, an approved spill response and cyanide first aid service provider who will be activated to respond in the unlikely event of an accident / incident where Sodium Cyanide has been spilt. Contract noted by auditor.

This plan does make provision for the actions of the lead escort driver and those drivers not directly involved in the accident / incident.

The method of transport is by road from Walvis Bay and B2Gold mine. The ERP was found to be appropriate for the transportation of cyanide by road transportation on the selected roads.

It was obvious that, according to the information in the ERP, and that in the RRA done, that the Transporter have considered all aspects of transport infrastructure e.g. road conditions, rail lines, rivers, etc. This will not really have affect on the response to an cyanide released incident. In the documented the process describes aspects of the transport infrastructure in sufficient detail. It was clear that the ERP was drafted specifically around the transport of cyanide in briquette form on weight limitation and skeletal trailer design specifications.

During the audit walkabout it was noted that the trailers onto which the 6 meter freight containers will be stacked are fitted with four twist locks with which the containers will be secured to trailer frame. It was further noted that the twist locks are operative and signs of been services noticeable.

Coleman Transport will not directly be involved in clean-up response as their role during an emergency situation, will be one of providing assistance where and when required. The entire emergency situation will be handled by the local Emergency Services in the affected area in conjunction with their approved spill clean-up service provider Namchem. Each role player's actions by their trained responders are clearly spelt out and found to be adequate to handle their tasks satisfactorily.

An agreement reached between the Transporter and the Management of Navachab mine and B2Gold mine for the utilisation of their emergency teams should transporter experiences a potential or spill of product.

With regards to the disposal of contaminated material / soil, an arranged have been reached that such be disposed of at the Consignee's facility where facility and capacity to perform this task is available.

Contents of the Transporter's emergency spill kit are found it to be adequate and applicable.

The Emergency Management Response Plan was forwarded to the Consignor (AGR Australia) for attention Mr. Ed Beard who acknowledged having received it. AGR as consignor will act in an advisory capacity and will render technical assistance if required.

**Transport Practice 3.2:** Designate appropriate response personnel and commit necessary resources for emergency response.

| | **X in full compliance with** |
|---|---|
| The operation is | □ in substantial compliance with Transport Practice 3.2 |
| | □ not in compliance with |

Summarize the basis for this Finding/Deficiencies Identified:

Transporter provided emergency response training of appropriate employees as specified in the ERP. Cyanide emergency response training has been conducted and an on-site emergency exercise that simulated an incident where product has been spilt was held. Evaluation of the exercise was done and findings documented. Action was taken to address the in deficiencies.

The responsibilities of response personnel identified and stipulated in the Emergency Response Plan. ER Plan spells out the expectations and responsibilities of each role player during an emergency situation

The ERP identified internal and external emergency responders and their responsibilities e.g. :-

- Convoy leader;
- Truck drivers;
- Consignee's Emergency Response Team;
- Navachab Emergency Response Team;
- Police Services on route;
- NAMCHEM Spill Recovery and Rehabilitation Team;
- Ambulance staff;
- Hospital staff;
- Fire Services on route;
- Affected communities;
- Consignor;
- Transport Management;
- Transporter's CEO.

External responders advised of their responsibilities. Relevant cyanide procedures used as training manuals for role players.

Training and awareness sessions for medical, emergency staff and traffic officers were held to understand cyanide emergencies. During December 2016 cyanide awareness training was presented by Consignor representative (Mr. Ed Beard) to the drivers and the escort leaders. Procedural and refresher training in emergency response procedures and ER Plan presented. Record of these training filed.

The escort vehicle drivers and the truck drivers attended a basic first aid, basic fire fighting and the transportation and handling of dangerous goods course presented by approved service provider. These training required by Namibian legislator before a driver will be issued a Professional driving permit (PrDP-D). Refresher training on the handling of Dangerous Goods done annually (legal requirement).

Namchem the Company's appointed spill recovery and rehabilitation of an effected area was also informed re the hazards of sodium cyanide. Relevant cyanide procedures were used as training manuals.

Transporter has own cyanide emergency response equipment available in the escort leader's vehicle leading the convoy. Equipment will be maintained and a separate check sheet for inventorying kept.

HCN gas detector device is available and escort leader hase been trained in the use of the equipment.

**Transport Practice 3.3:** Develop procedures for internal and external emergency notification and reporting.

**X in full compliance with**

The operation is
- □ in substantial compliance with Transport Practice 3.3
- □ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

A written plan dealing with off-site emergencies compiled and available.

Transporter to ensure that internal and external emergency is notified. Transporter developed various procedures of which the content refers to who must be notified e.g. Transport Management Plan, ER Plan, Incident Reporting & Investigation Procedure and Route Emergency Contact Numbers. Documentation is available.

TMP and Incident Reporting & Investigation Procedure revised annually. Emergency Response Plan and Emergency Contact Numbers revised at least twice per year or as a post-drill recommendation derived from an emergency drill or after a real emergency situation.

The list of contact number approved by Transporter's Operations Manager. The list of telephone numbers included in driver's package which accompanies escort leader and each driver on route. The availability of such list also forms part of escort leader's checklist.

Depot Manager appointed as Emergency Controller. One of his duties is to keep the emergency contact telephone list updated and to submit required reports to Governmental Authorities.

**Transport Practice 3.4**: Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

**X in full compliance with**

The operation is
- □ in substantial compliance with Transport Practice 3.4
- □ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The clean-up and rehabilitation process of an effected area outsourced to a commercial chemical remediation company, Namchem, who is based in Walvis Bay. This Emergency Spill Responder is responsible for the clean-up of the contaminated soil / product and to remove such to B2 Gold mine where the waste will be disposed. Outsourced Company responsible for the rehabilitation of affected area.

Product physical properties included in ERP under heading “Product Information”. Clause 6.2 on page 10 of 16 of the ERP states that one of the Transport Management’s responsibilities for a spill is; -

- *Assist, where require, to clean up any spilled product and remediation of contaminated soil under the supervision of personnel from the Navachab or B2Gold mine site.*

Clause 6.4.2 of the Transport Management Protocol number forbids the use of sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into dams, water sources or rivers. Namchem Emergency Spill Response Plan clauses 4.5.4(a) and 4.5.4(l) and the Consignor echo the same than the Transporter’s Protocol with regards to the use of sodium hypochlorite, ferrous sulfate and hydrogen peroxide.

No Sodium Hypochlorite, Ferrous Sulfate and / or Hydrogen Peroxide is kept on the Transporter’s premises. Ferrous Sulfate in small quantities used to locate traces of cyanide remains after clean-up have been done.

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

**X in full compliance with**

The operation is
- □ in substantial compliance with Transport Practice 3.5
- □ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The ERP stipulates that a review of the plan be done at least on an annual basis or as a result of changes to conditions along a primary of secondary routes, changes to the transport equipment that is to be used, emergency drills and lessons learned and gathered from accidents, incidents, additional information, observations and other responses or after a significant incident or after a mock drill. Official summary of the exercise is awaited from Transporter. Report submitted and found to be adequate.

Once reviewed adequacy be tested and thereafter be implemented.

Emergency mock drills will be held at least annually. Drills evaluated to determine if response time and if procedures are adequate, equipment is appropriate and personnel are still acquainted with emergency requirements. Post mortem reports compiled and retained.

End of report.