SUMMARY AUDIT REPORT
FOR THE ADDITION OF TNO TO CYANCO'S NORTH AMERICA RAIL AND TRUCK SUPPLY CHAIN
(ADDITION TO EXISTING CERTIFICATION SUMMARY AUDIT REPORT)

CYANIDE TRANSPORTATION
NORTH-WEST TRANSPORT INC.
(TRANSPORT NORD-OUEST INC.)
TRUCKING COMPANY AS PART OF CYANCO'S SUPPLY CHAIN

NORTH-WEST TRANSPORT INC.
(TRANSPORT NORD-OUEST INC.)
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(Signature Lead Auditor Dr. Steinweg)

Name of Cyanide Transportation Consignor:	Cyanco Corp., Cadillac, QC, Canada
Consignor's Supply Chain:	North America Rail and Truck Supply Chain
Trucking Company to be compliance audited as part of Cyanco's supply chain:	Transport Nord-Ouest Inc. (TNO)
Name of Facility Operator:	North-West Transport Inc.
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Location detail and Description of operation:

The US-american company Cyanco Corp. produces cyanide as a manufacturer in the Winnemucca site in Nevada, US and in the recently new-built solid sodium cyanide plant in Alvin, Texas. From both sites the cyanide is being delivered to Cyanco's Cadillac terminal by using rail tank cars. The customers / the gold mines can be found on different sites / mines in the Québec and Ontario region. Accordingly different supply chains are utilized. In this report, Cyanco's North America Rail and Truck Supply Chain is covered, especially the eastern Canadian portion of the supply chain in the Ontario and Quebec region. All the different supply routes, starting at Cyanco's Cadillac Terminal, are operated by the trucking company Transport Nord-Ouest Inc. (TNO). TNO is located – among other sites- in Val d'Or, QC, Canada.

By performing an audit and assuming compliance with the relevant portions of ICMC's Cyanide Transportation Verification Protocol, it's intended to add TNO to Cyanco's ICMC certified North America Rail and Truck Supply Chain. Subject of the audit is TNO's fulfilment of ICMC's transportation requirements in cooperation of Cyanco Corp., Cadillac (as consignor) and TNO (as trucking company within Cyanco's supply chain).

TNO started business in 1965, main customers are mines, TNO transports only bulk material, no packaged materials. In general for the transportation activities TNO Val d'Or utilizes 26 trucks on the road, 21 own and 5 broker trucks. In total there are 30 drivers under contract (all of them safety certified acc. to Canadian legislation), 5 mechanics, 2 supervisors and 5 admin / office persons. The licences for the Québec and the Ontario region are available. The utilized 6 tank container trailers a fully owned by Cyanco. The maximum load of a licenced truck is 140,000 pound (63,500 kg). A full load of a cyanide tank container weighs approx. 122,000 pound (55,340 kg). TNO runs a workshop for repair and maintenance of tractors, containers, etc. This workshop operates with the 5 above mentioned mechanics.

Supply from the production site to the customers / mines

As described in Transport Practice 1.1 in detail it's the Cyanco organization to define the routes incl. risk assessment etc.. TNO is the contracted trucking company. The definition of the routes is given in the Cyanco document "Designated Routes 2013-rev 1/7/2013", that shows in detail the routes, starting at the Cadillac terminal. In each case the route starts at Cyanco's Cadillac terminal and leads directly with no interim storage to the different mines sites in the Québec and Ontario region. During regular operation all the routes are short-term resp. one-day-trips.

Conclusion / Compliance with ICMC transportation Code

According to ICMI's Auditor Guidance for use of the Cyanide Transportation Verification Protocol (01.2011), Chapter "General Guidance", subclause 9 it's Cyanco Canada Inc. to rely on TNO as a contracted trucking company **within Cyanco's trucking supply chain** to transport Cyanco's cyanide solution across the routes in eastern part of Canada. It's also Cyanco to define the extent of their supply chain (here: many short / one-day routes in the Québec and Ontario region). But in addition to a truck carrier like TNO, Cyanco must include all the involved parties within its supply chain(s) so that stakeholders will be able to review their audit investigations along with the summary audit reports of the trucking companies involved in a certified supply chain. Referring to this requirement, the **present report represents the audit report for TNO to add TNO to Cyanco's ICMC certified North America Rail and Truck supply chain**.

The auditor evaluates TNO's operation as in full compliance, **as far as the requirements can be stated as relevant for the trucking company** TNO. TNO did not apply for registration as a transportation consignor, as this is not senseful. As far as TNO is contracted to portions of the supply chain in the Québec and Ontario region, they did fulfil the requirements, in close conjunction with their customer Cyanco.

The following report is documenting the findings and results of this assessment. The auditor's duty is to give a detailed description of the performance and of the organizations quality, environmental and occupational health system to fulfil the respective requirements of the Code, as they are applicable to a trucking company within a supply chain. This is the purpose of the present report.

Auditor's Finding

This operation is

- ☒ in full compliance (see also Conclusion / Compliance with ICMC transportation Code)
- ☐ in substantial compliance *(see below)
- ☐ not in compliance

with the International Cyanide Management Code.

This full compliance status is reached in close conjunction between TNO and their client Cyanco Corp.. As stipulated in their contract some portions of the requirements were fulfilled by TNO, some by Cyanco and some by both of them in close cooperation (details in below mentioned findings chapters). TNO can be included into Cyanco's already ICMC certified North America Rail and Truck supply chain as a audited and compliant trucking company.

* For cyanide production 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.

Audit Company	LULU Intelligent Organization
Audit Team Leader	Dr. Benno Steinweg
Email	Benno.Steinweg@googlemail.com
Names / Signatures of other auditors ...	n/a
Date of audit	Feb 13 - 15, 2013

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 Production Operations and using standard and accepted practices for health, safety and environmental audits.

PRINCIPLE 1 – OPERATIONS:

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.

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

The fulfilment of these Transport Practice's requirements is above all Cyanco's responsibility. Transport Practice 1.1 compliance is mainly achieved by Cyanco's environmental and work safety system, supported partially by TNO's input, procedures and environmental / work safety system.

Summarize the basis for this Finding:

TNO is not active in the process of selecting the routes. It's up to Cyanco (consignor of the cyanide shipment to be transported by TNO) to define the routes. TNO's responsibility is to contribute to the evaluation process (define feasibility to drive the routes e.g. during winter time across frozen lakes etc.). Routes used for cyanide deliveries will be those as determined by Cyanco's protocol in order to minimize the risk of accidents and the impact of any accidents and releases. Cyanco has predetermined the optimal routes based on their risk assessment. TNO utilizes those routes as determined by Cyanco's protocol. For long haul routes, prior to departure, the TNO supervisor discusses the route itinerary intensively and individually with the driver. The Cyanco document "Designated Routes 2013-rev 1.7.2013" shows in detail the routes, starting at the Cadillac terminal. TNO's processes, defined in their ERP ("Health and Safety Program", Feb 18, 2013), stipulates some monitoring activities and actions to the drivers according to the condition on route (see later). Nevertheless: it's Cyanco's task and duty to define the routes, especially taking into account population density, infrastructure's condition and construction (bridges etc.), pitch and grade of the roads used, load-bearing capacity of ice when crossing frozen lakes as well as prevelance and proximity of water and fog.

TNO together with Cyanco documents the measures taken to address risks. This is done in the Cyanco ERP and also in the TNO ERP. There are some general issues to be done to prevent risks during transportation (like maintenance of tractors, having GPS on board etc.). Those requirements are described in general in TNO'S ERP. Drivers will notify regarding irregularities or changes in the routes as they may occur. Drivers will also take note of such changes, and the TNO supervisor will email those information to Cyanco as fast as required. During severe driving conditions the operator will use his judgement whether to pull the vehicle over when conditions warrant. In addition, the TNO supervisor will determine whether the weather forecast and actual road conditions permit transport of product.

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.

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with Transport Practice 1.2
- ☐ not in compliance with

The fulfilment of these Transport Practice's requirements is above all Cyanco's responsibility. Transport Practice 1.2 compliance is mainly achieved by TNO's environmental and work safety system, supported partially by Cyanco's input, procedures and environmental / work safety system. To maintain TNO's compliant fulfilment the respective standard operating procedures are subject to be frequently audited by Cyanco's representatives.

Summarize the basis for this Finding:

The TNO ERP ("Health and Safety Program", Feb 18, 2013) describes that TNO employs only qualified Class 1 drivers, who are experienced, qualified, and who have the proper training as Class 1 drivers, and special knowledge and skills in the transport of sodium cyanide. New drivers in addition have to be qualified and trained. Class 1 drivers will be indoctrinated and trained in the handling of cyanide off loading, and will be accompanied for a minimum of 5 loads with an experienced cyanide operator and trainer. Each new or transferred employee will be indoctrinated on the first day of his or her employment. Supervisory or training personnel will conduct the indoctrination covering all aspects of health and safety relating to their workplace. An indoctrination check list must be completed and signed by the employee and the supervisor. New cyanide drivers will be instructed at the Cyanco facility with in house videos and documentation, and will duly complete Cyanco's offloading checklist. Training refreshers must be done annually. A list was on desk showing the 4 TNO licensed drives. Only those 4 drivers are actually allowed to do cyanide transports. A further list shows the specific requirements from the training company "Formation Professionelle" with respect to local and Canadian requirements (e.g. TDG training, class 01 licence etc.). The docs from individual drivers were shown and inspected and evaluated as full. Training schedules for all drivers aremaintained.

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

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with Transport Practice 1.3
- ☐ not in compliance with

The fulfilment of these Transport Practice's requirements is above all Cyanco's responsibility. Transport Practice 1.3 compliance is mainly achieved by TNO's environmental and work safety system, supported partially by Cyanco's input, procedures and environmental / work safety system. To maintain TNO's compliant fulfilment the respective standard operating procedures are subject to be frequently audited by Cyanco's representatives.

Summarize the basis for this Finding:

The tank containers to be pulled by TNO's vehicles / tractors are Cyanco's property. It's Cyanco's duty to set up and realize a maintenance program for the tank containers. Cyanco has 6 containers in operation (called and labeled as NaCN01 – NaCN06). The maintenance program for those containers could have been verified during the last ICMC audit at the Cyanco terminal site. The maintenance and potential repair work is not done by Cyanco itself but is contracted to qualified motor vehicle workshops, e.g. TNO's workshop. Examples of the maintenance documentation of Cyanco-owned tank containers could be verified at the TNO workshop during the on-site visit of TNO's maintenance workshop. Maintenance on the tank containers is in responsibility of Cyanco. During a transport drivers periodically perform circle checks during the day to verify equipment and check e.g. for tanker leakage.

Regarding the TNO's owned transport equipment (tractor, communication equipment etc.) maintenance plans and schedules are available and are under responsibility of TNO. The maintenance plans and the schedules for each and every of the trucks are available. They realize the legal requirements to do technical checks each 6 or 12 months, respectively. The maintenance activities are drawn up in specific checklists, the recording about fulfilling / repair needs is done in the same checklist. Those "Liste Maintenance Remorque" is defining all the necessary "Entretien preventif" (= preventing / predictive maintenance). The documentation is supported by yellow work instructions, that say in detail what has to be done, in particular also acceptance criteria are defined. Few examples onsite the truck maintenance documentation were verified (graissage, change d'huile, fiter d'air, antigel, lumiere, freines etc.). The name of the operating motor mechanic was comprehensive, too.

In general for the transportation activities TNO Val d'Or utilizes 26 trucks on the road, 21 own and 5 broker trucks. In total there are 30 drivers under contract (4 of them qualified as cyanide transportation drivers), 5 mechanics, 2 supervisors and 5 admin / office persons. The licences for the Québec and the Ontario region are available. The maximum load of a licenced truck is 140,000 pound (63,500 kg). A full load of a cyanide tank container weighs approx. 122,000 pound (55,340 kg). So in each case it's guaranteed, that the licenced containers, constructed according to the licence requirements, are able to bear the loaded cyanide weight incl. equipment.

<u>Transport Practice 1.4:</u> Develop and implement a safety program for transport of cyanide.

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with Transport Practice 1.4
- ☐ not in compliance with

The fulfilment of these Transport Practice's requirements is above all Cyanco's responsibility. Transport Practice 1.4 compliance is mainly achieved by Cyanco's environmental and work safety system, supported partially by TNO's input, procedures and environmental / work safety system.

Summarize the basis for this Finding:

TNO has introduced a safety program with respect to cyanide transportation ("Health and Safety Program", Feb 18, 2013), especially chapter "Sodium Cyanide Transport Policies and Procedures". It describes

- the vehicle inspection prior to each transport ("Drivers will perform a circle check as required by law prior to departure. A completed copy of the inspection checklist will be submitted to the dispatcher along with bills of lading at the end of each shift.")
- A preventive maintenance program for the tractors
- Limitations on driver's hours (13 hrs. max followed by 8 hrs break, max. 60 hrs /week)
- Prevention of load shifting requirements are not necessary because transportation is only done with fully filled tank containers, no solids
- Procedure for modification and suspension of transports, even during transportation. The Health and Safety Program requires that during severe driving conditions the operator will use his judgement

whether to pull the vehicle over when conditions warrant. In addition, the supervisor will determine whether the weather forecast and actual road conditions permit transport of product. Any events will be documented by the driver on the Bill of Lading (BOL).

- The prohibition of drugs and alcohol and the requirements that Drivers are not allowed to operate under the influence of drugs or alcohol
- The retention of records that demonstrate the fulfillment of the above mentioned requirements, e.g. maintenance record, training records, end of trip records, logbook for driving hours etc.

TNO has committed to ensuring that prior to departure the driver inspects the vehicle to ensure it is properly placarded for sodium cyanide on all 4 sides and that the sealing –as defined in safety program- is consequently in place. During periodic circle checks during the day, the driver will ensure that placarding and sealings are still in place.

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

This section is not applicable as no modes of air or sea transport are used during supply chain no. 5.

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

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with Transport Practice 1.6
- ☐ not in compliance with

The fulfilment of these Transport Practice's requirements is above all Cyanco's responsibility. Transport Practice 1.6 compliance is mainly achieved by TNO's environmental and work safety system, supported partially by Cyanco's input, procedures and environmental / work safety system. To maintain TNO's compliant fulfilment the respective standard operating procedures are subject to be frequently audited by Cyanco's representatives.

Summarize the basis for this Finding:

Communication with and among TNO vehicles during the cyanide transportation is undertaken using mobile phones, short-wave radio, and satellite phone. The pre-trip checklist asks for the necessity for a sat phone on the particular trip. In case of problems being announced by the driver or in case of an emergency the focal point reacts according to TNO's ERP. All relevant phone numbers are listed. Once an event occurred and an alert message was sent from the driver to TNO's contact focal point, the TNO head office in cooperation with emergency service Newalta manages all associated communications with the respective mine and the cyanide producer. Cyanide tractors will be in contact at all times with dispatch by cell phone or PeopleNet in addition to being tracked by SkybitzGPS, or by satellite phone. A waybill accompanies the transportation which includes chain of custody data such as container numbers, waybill numbers, shipping documentation, MSDS, packing list, bill of lading, customs declarations, producer invoice, copy of lease agreement etc.

All communication equipment is tested on a routine basis. Blackout areas during the different routes from the Cyanco terminal to the mine sites are defined by Cyanco in their cyanide transportation route description. Cyanide tractors are in contact at all times with TNO dispatch by cell phone or PeopleNet in addition to being tracked by SkybitzGPS, or by satellite phone.

PRINCIPLE 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.

In terms of Cyanide Code definitions, TNO as a transportation contractor for Cyanco Canada Inc. do not need and thus does not have interim storage facilities. Once a Cyanco-owned tank container is hooked-up at TNO's tractor, the transportation routinely is started and ended at the final mine site destination at the same day. There is no changing carriers or transport modes as well as there are no truck and rail terminals and port facilities or other trans-shipping depots and interim storage sites involved in TNO's cyanide hauling operations. The only planned stoppages are may be caused by a pause at a truck-stop or gas station.

This section is not applicable as no storage / interim storage is done during TNO's transportation activities.

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.

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with Transport Practice 3.1
- ☐ not in compliance with

The fulfilment of these Transport Practice's requirements is above all Cyanco's responsibility. Transport Practice 3.1 compliance is mainly achieved by Cyanco's environmental and work safety system, supported partially by TNO's input, procedures and environmental / work safety system.

Summarize the basis for this Finding:

Cyanco as the consignor of the cyanide shipments is performing the road risk assessment, is preparing the filling and the finishing of the tank containers "ready to be pulled to the mine", is having an ERP in coordination with their external emergency response provider Newalta, the mines and TNO - and is not active in transport operating activities on site. This activity is subcontracted to TNO. TNO has implemented an own Emergency Response Plan, following Cyanco's Emergency Response Plan. TNO's ERP was drafted with support of Cyanco's Cadillac Terminal Superviso. Thus this plan has been agreed with the cyanide manufacturer. TNO's ERP is a detailed document. The ERP includes, among other information, the emergency response team, emergency phone directory, communication channels guidelines, emergency scenarios, and instructions to attend specific and general emergency scenarios. The Emergency Response Plan refers to the routes and route assessments, defined by Cyanco. Respective preventive and mitigation measures, and emergency response actions are defined. The plan has a detailed explanation of the sodium cyanide characteristics and toxicity based

on the MSDS. The emergency scenarios, the general emergency response instruction, and the scenario-specific instructions consider the liquid state of the cyanide and its incompatibility with water and other substances as well as the importance of the separation from other products. All the scenarios are in relation with accidents of trucks hauling a tank container, which is the only transportation modality used by TNO on Cyanco's Québec and Ontario routes. Finally the main owner of the emergency response process is Cyanco – in close cooperation with their external emergency response provider Newalta. But nevertheless it's TNO to describe their portion of responsibility with their own ERP ("Health and Safety Program", Feb 18, 2013; including Cyanco document "Designated Routes 2013-rev Jan 07th, 2013), in close cooperation with Cyanco.

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

This operation is

- ☒ in full compliance with
- ☐ in substantial compliance with Transport Practice 3.2
- ☐ not in compliance with

The fulfilment of these Transport Practice's requirements is above all Cyanco's responsibility. Transport Practice 3.2 compliance is mainly achieved by TNO's environmental and work safety system, supported partially by Cyanco's input, procedures and environmental / work safety system. Some tasks are dominated intensively by Cyanco (e.g. organizing mock drills). To maintain TNO's compliant fulfilment the respective standard operating procedures are subject to be frequently audited by Cyanco's representatives.

Summarize the basis for this Finding:

The transporter TNO does not organize mock drills or emergency response trainings for his own personnel, but TNO is involved in the mock drill and training program of Cyanco, as it is defined in their program. TNO's ERP states that table top reviews of the ERP procedures and policies will take place routinely together with Cyanco, and a mock simulation every 5 years. A full simulation, organized and led by Cyanco, is planned for July 2013, including TNO's ER organization.

Descriptions of the specific emergency response duties and responsibilities of personnel are defined in sufficient detail. The master definition on "how and who" is given in TNO's ERP. Each and every individual step is described. Key interface for the driver is the TNO dispatcher as well as the direct call to Chemtrec / Newalta, the external emergency provider. The cyanide drivers of TNO are all trained in these procedures and ways to communicate. The transport vehicle operators receive initial and periodic refresher training in emergency response procedures including implementation of the Emergency Response Plan.

There is a list of all emergency response equipment (emergency response kit), that has to be available during transport and along the transportation route. Finally all cyanide drivers must comply with the legal and mandatory TDG training requirements (TDG = training for transportation and handling of dangerous goods) – and they do.

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

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with Transport Practice 3.3
- ☐ not in compliance with

The fulfilment of these Transport Practice's requirements is above all Cyanco's responsibility. Transport Practice 3.3 compliance is mainly achieved by Cyanco's environmental and work safety system, supported partially by TNO's input, procedures and environmental / work safety system.

Summarize the basis for this Finding:

Descriptions of the specific emergency response duties and responsibilities and ways of communication are defined in sufficient detail in TNO's Emergency response plan (ERP). The plan explains the initial steps that should be taken by a transport truck driver after a transportation incident involving sodium cyanide has occurred. Key interface for the driver is the TNO dispatcher as well as the direct call to Chemtrec / Newalta, the external emergency provider. The full list of internal and external contact people and organizations is given. The cyanide drivers of TNO are all trained in these procedures and ways to communicate.

Table top reviews of the ERP procedures and policies take place every 6 months with Cyanco, and a mock simulation every 5 years. Driver review of the ERP policies and procedures occur yearly. The manual (as an umbrella document, including ERP) has to be reviewed and updated yearly. Last review was done in Feb 2013. The necessary routines for document control are organized by the highest management of TNO. .

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

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with Transport Practice 3.4
- ☐ not in compliance with

The fulfilment of these Transport Practice's requirements is above all Cyanco's responsibility. Transport Practice 3.4 compliance is mainly achieved by Cyanco's environmental and work safety system, supported partially by TNO's input, procedures and environmental / work safety system. To maintain TNO's compliant fulfilment the respective standard operating procedures are subject to be frequently audited by Cyanco's representatives.

Summarize the basis for this Finding:

Regarding remediation (recovery or neutralization of solutions), decontamination of soils or other contaminated media and management / disposal of spill clean-up debris it's Cyanco's ICMC certified safety management system, that defines the way of working during an emergency or a spillage. According to this Cyanco regulation the TNO driver has to contact his TNO dispatcher and / or NewAlta as the external emergency response service supplier. This duty is defined in TNO's ERP. All the further necessary actions are planned and done according to Cyanco's ERP in conjunction with TNO's ERP. TNO's drivers have to act passively: they have to give information and –if they can safely do so- have to do initial actions around the scene. TNO (here: dispatcher) with the aid of

Cyanco will advise external responders, medical facilities and communities of their roles or mutual aid during an emergency response. NewAlta will be the primary responder in the event of a road accident or spillage. So fast and full reporting has to be given, especially information on: size of the leak, spill, or release, whether the leak, spill, or release is ongoing, approximate amount of the leak, spill, or release, whether the leak or spill is in the water. The transport truck drivers, if he can safely do so, places cones and signage around the transport trailer to keep others at a safe distance away from the leaking or spilled product.

Finally TP 3.4 is to be fulfilled mainly by Cyanco and his external emergency response company Newalta. TNO ha to support during emergency responsing with a defined portion of activities.

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

This operation is

- ☒ in full compliance with
- ☐ in substantial compliance with Transport Practice 3.5
- ☐ not in compliance with

The fulfilment of these Transport Practice's requirements is above all Cyanco's responsibility. Transport Practice 3.5 compliance is mainly achieved by Cyanco's environmental and work safety system, supported partially by TNO's input, procedures and environmental / work safety system.

Summarize the basis for this Finding:

TNO's ERP is quite new and the practice had started shortly prior to the compliance audit. The necessary definitions and process descriptions for periodically reviewing and evaluating are clearly given in TNO's ERP and Health & Safety program. Table top reviews of the ERP procedures and policies will take place every 6 months together with Cyanco, and a mock simulation every 5 years. The next is planned in July 2013. According Canadian law these safety procedure table-top reviews are required each and every year. Driver review of these policies and procedures will occur yearly. TNO's health & safety program manual will be reviewed and updated yearly. In conjunction with an potential adjustment / change (driven by time or by event) all other corresponding response procedures and requirements have to be adjusted.