August 2011

ICMI RECERTIFICATION SUMMARY REPORT

Freight Forwarders Kenya Ltd, Mombasa, Kenya

Submitted to:
International Cyanide Management Institute (ICMI)
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Washington, DC 20006
United States of America

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REPORT

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Golder Associates

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1.0 SUMMARY AUDIT REPORT FOR TRANSPORTATION

Name of Cyanide Transportation Facility:	Freight Forwarders Kenya (FFK)
Name of Facility Owner:	Freight Forwarders Kenya Ltd
Name of Facility Operator:	Freight Forwarders Kenya Ltd
Name of Responsible Manager:	Hafiz Noormohamed, General Manager FFK Ltd
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2.0 LOCATION DETAIL AND DESCRIPTION OF OPERATION

2.1 Freight Forwarders Kenya Ltd

Freight Forwarders Kenya (FFK) Ltd was incorporated in 1973 following the amalgamation of three clearing and forwarding agents namely Kenya General Agency Ltd, Reynolds and Co Ltd and Wafco Ltd.

FFK became a Signatory to the Code in November 2007 and was certified as being fully compliant with the Code on 27 May 2008.

FFK is a member of the Kenya International Clearing, Forwarding and Warehousing Association and was a founder member of the Association's predecessor, the Kenya Clearing, Forwarding and Warehousing Association.

With over 30 years of experience, FFK has developed a network of subsidiaries and agents enabling the organisation to offer the following range of Clearing, Forwarding and Logistics services:

- Customs clearance;
- Marine services;
- Warehousing.
- Transportation;
- Procurement services;
- Communications; and
- Transportation.

FFK has a close working relationship with Freight Forwarders Tanzania Limited (FFT) and both are part of Freight Forwarders Group (FFG).

Solid sodium cyanide transported by FFK is manufactured by Orica Australia Limited (Orica) and packaged in heavy duty plastic bags inside nylon bulk bags which are packaged into UN approved wooden boxes within 20 foot shipping containers. At the time of the audit, FFK delivered to one client site within Tanzania.

2.2 Freight Forwarders Group Ltd

The Freight Forwarders Group is a well established clearing, forwarding and logistics organisation that traces its roots back to 1932, making it one of the oldest Logistics firms in East Africa. The Group has developed and sustained a wide variety of logistics-related infrastructure in the region and has maintained a market leading presence for several decades. The Group includes the following entities:

- Freight Forwarders Kenya (FFK) Ltd;
- Freight Forwarders Tanzania (FFT) Ltd;
- Freight Forwarders East Africa Ltd;
- Transeast Uganda Ltd;
- Transeast Ltd;
- Multiport International Ltd;
- Allied Wharfage Ltd (AWL);
- Easytrans Ltd;
- Mainline Carriers Ltd (MCL); and
- Minetec Tanzania Ltd.

2.3 Allied Wharfage Ltd

Allied Wharfage Ltd (AWL) was formed in 1990 to provide warehousing and related services. AWL's interim storage facility is located off Magongo Road in the Changamwe district of Mombasa approximately seven kilometres (km) to the northwest of the Port of Mombasa and 11 km to the northwest of the city of Mombasa at coordinates -4.009887 +39.601057. The interim storage facility is close to the main Nairobi highway and Moi International airport. The facility covers an area of 7972 m^2 (1.97 acres) and is a roughly rectangular in shape with an entrance gate on the northern boundary. The interim storage facility holds bonded, transit and local cargos and is owned and managed by AWL, a wholly owned company of FFK.

Shipping containers containing cyanide are held in the interim storage facility while customs documents are obtained (as the cyanide shipments are delivered to North Mara mine, in Tanzania, the cargo is considered bonded cargo (tax free)). In addition, clearance has to be given from the mine that the last section of road is in good order as this section of road can be affected by heavy rains. Therefore the shipments can be held in AWL's facility for up to two weeks. The shipping containers are never opened and the cyanide is not repackaged in any way. There was no cyanide present at the time of the audit.

The cyanide containers are handled by a Terex reach stacker. Clearing and forwarding services for AWL are undertaken by its principal company FFK, while transportation is undertaken by its group associated company, Transeast Ltd.

2.4 Transeast Ltd

Transeast Ltd (Transeast) is located immediately to the west of AWL's interim storage facility and shares the same access road. The entrance gate is on the northern boundary. The company specialises in the transport of regular containerised cargo, bulk cargo, out of gauge cargo and Dangerous Goods within the East and Central African region. Transeast is a subsidiary of FFK who is also its key customer.

Transeast transport all cyanide for FFK. They utilise a fleet of well maintained trucks with assorted trailers to move cargo from the Port of Mombasa to its various client destinations.

Table 1: Mine delivered to by FFK

Client	Mine	Supplier	Distance (km)	Travel time (days)
African Barrick Gold	North Mara Mine	Orica	1,079	5 (2 days at border)

Cyanide is transported from AWL's interim storage facility along the Mombasa to Nairobi highway and through the Isebania border point into Tanzania. From the border, the cyanide is transported to the mine customer for offloading.

SUMMARY AUDIT REPORT

Auditors Findings

Freight Forwarders Kenya is:

☒ **in full compliance with**

☐ in substantial compliance with

☐ not in compliance with

The International Cyanide Management Code

No significant cyanide incidents or cyanide exposure incidents were noted as occurring during the audit period.

Audit Company: Golder Associates

Audit Team Leader: Sophie Wheeler, Lead Auditor

Email: swheeler@golder.com

Name of Other Auditors

Auditor, Position	Signature
Dale Haigh, Transportation Technical Specialist	

Dates of Audit

The Recertification Transport Audit was undertaken within three days (three person-days) between 19 May and 21 May 2011.

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.

Freight Forwarders Kenya		17 August 2011
Name of Facility	Signature of Lead Auditor	Date

PRINCIPLE 1 – TRANSPORT

Transport Cyanide in a Manner that Minimizes the Potential for Accidents and Releases

Transport Practice 1.1: **Select cyanide routes to minimize the potential for accidents and releases.**

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Transport Practice 1.1**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

FFK, with its sub-contractors Transeast and AWL have implemented a procedure for transport route selection to minimise potential for accidents and releases, in an environment where there are limited practical alternative transport routes.

The transport routes have been periodically reviewed and analysed for risks and restrictions. Numerous actions were identified and implemented to improve safety during this process. Drivers also assess and report on conditions during each trip. FFK, its clients and suppliers have consulted various stakeholders and applicable governmental agencies as necessary in the selection of routes and development of cyanide management measures.

Convoys are used for every cyanide delivery as a means of managing the risks along the route (e.g., traffic and people, poor road conditions). Each convoy is led by a support vehicle and fitted with signs and flags, and uses dipped headlights.

FFK largely manages its own emergency response but contacts emergency support (police and hospitals) along the route each year. These stakeholders were consulted on cyanide and advised of their roles during an emergency.

FFK subcontracts the transport of cyanide to Transeast and the interim storage of cyanide to AWL under Service Level Agreements. The Service Level Agreements require Transeast and AWL to comply with the ICMC. FFK has developed an audit protocol to assist in the subcontractor performance assessment.

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.**

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Transport Practice 1.2**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

FFK through its subcontractors AWL, only uses trained and competent operators to drive its Reach Stacker within its Interim storage facility.

FFK sub-contracts the driving of trucks carrying cyanide to Transeast. Transeast have only used trained and competent operators to drive its trucks.

FFK, Transeast and AWL maintain files on their drivers that contain copies of licences (heavy vehicle drivers licences) and training records. FFK maintains copies of the files on drivers used by its subcontractors.

There is no requirement in Kenya and Tanzania for drivers to be licensed for dangerous goods transport. Kenya and Tanzania are both in the East African Community (EAC) where all members driving licences are accepted in each country. All personnel from FFK, Transeast and AWL operating cyanide handling and transport equipment have been trained to perform their jobs in a manner that minimises the potential for cyanide releases and exposures. The training of cyanide handling and transport equipment operators is coordinated by FFK.

Interviews with drivers at FFK, Transeast and AWL indicated that all FFK and subcontractor personnel operating cyanide handling and transport equipment are competent to perform their jobs in a manner that minimises the potential for cyanide releases and exposures.

FFK subcontracts the transport of cyanide to Transeast and the interim storage of cyanide to AWL under Service Level Agreements. The Service Level Agreements require Transeast and AWL to comply with the ICMC. FFK has developed an audit protocol to assist in the subcontractor performance assessment.

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

☒ **in full compliance with**

The operation is

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

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

FFK and its subcontractors Transeast and AWL only use equipment designed and maintained to operate with the design loads.

Transeast and its trailer suppliers (Nelion Trading Limited) have determined that the maximum trailer loading capacity for the trailers they use for cyanide loads is 45 tonnes. Orica supply cyanide containers of around 23 tonnes weight which is well within the capacity of the trailers. FFK with Transeast also ensure that each trailer only carries one load. The gross weight (trailer and load weight) allowed on Kenyan road is 48 tonnes and the loaded trailers are well below this limit.

FFK and its subcontractors have procedures in place to verify the adequacy of the equipment for the load it must bear and its fitness for purpose. FFK has performed daily vehicle checks during the convoys carried out between 2009 and 2011, and these are documented. Transeast also have routine maintenance schedules and ad hoc maintenance procedures that include checks for structural problems on the vehicles. Transeast and AWL maintain records of vehicle specifications and maintenance history.

FFK and its subcontractors have procedures in place to prevent overloading of the transport vehicles being used for handling cyanide. Transeast have sufficient vehicles of appropriate capacity to ensure that no other vehicles (without sufficient capacity) are used. The procedures and inspections carried out ensure that only one cyanide container is loaded and that no other freight is added to the vehicles.

FFK subcontracts the transport of cyanide to Transeast and the interim storage of cyanide to AWL under Service Level Agreements. The Service Level Agreements require Transeast and AWL to comply with the ICMC. FFK has developed an audit protocol to assist in the subcontractor performance assessment.

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

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Transport Practice 1.4**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

FFK along with its subcontractors Transeast and AWL, has implemented procedures which have ensured that the cyanide is transported in a manner that maintains the integrity of the packaging. These include ensuring that containers are securely attached to the trailers using twistlocks and frequent inspection that the secure attachment remains in place during the convoy.

Local signs have also been used by FFK to identify shipments as containing cyanide for each convoy. These signs are attached to the lead vehicles and all cyanide containing vehicles. In addition, the vehicles carry red flags and dipped headlights are used. The signage is inspected prior to starting the convoy and at various stops each day as the convoy progresses.

Equipment consists of road vehicles (trailers) that were purchased to a design specification appropriate to carry the cyanide containers. FFK has developed a Safety Program which is implemented in conjunction with its subcontractors Transeast and AWL. This includes vehicle inspections prior to each shipment and preventive maintenance activities. Limitations on driver hours are also managed by Convoy Leaders who ensure that driver hours are limited each day, and through the use of the GPS system which also monitors driver hours. Procedures have also been followed to prevent loads from shifting through the use of twistlocks. Procedures are also in place for modifying or suspending travel during severe weather and the Convoy Leaders assess conditions and can take appropriate action.

FFK and it sub-contractors also have a drug prevention policy. Records are maintained for all aspects of the Safety Program.

FFK subcontracts the transport of cyanide to Transeast and the interim storage of cyanide to AWL under Service Level Agreements. The Service Level Agreements require Transeast and AWL to comply with the ICMC. FFK has developed an audit protocol to assist in the subcontractor performance assessment.

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

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

FFK does not transport cyanide by sea or air and therefore this principle is not applicable.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Transport Practice 1.6**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

FFK, through its sub-contractors Transeast and AWL has effective means of communication with their transport vehicles. Communication systems include GPS tracking which is used for all cyanide shipments; the use of long-range cell phones which are continuously on and satellite phones. All communication equipment is checked prior to the start of each convoy, during the convoy pre-checks and at various points each day.

Communication risk areas have not been identified in Kenya where total coverage is obtained through the use of cell phones, but a satellite phone is used to cover Tanzania.

FFK has systems to track the progress of cyanide shipments. FFK's subcontractors (Transeast) utilise a GPS system (which is continuously monitored) to track progress along the routes while FFK also log convoy movements using telephone text messaging, which are also recorded. All information is shared between the parties.

FFK has appropriate inventory controls and chain of custody documentation to prevent loss of cyanide during shipment. Vehicles are also weighed at weighbridge station along the route which verifies that no material is lost. All trucks carry a material safety datasheet for sodium cyanide in English.

FFK subcontracts the transport of cyanide to Transeast and the interim storage of cyanide to AWL under Service Level Agreements. The Service Level Agreements require Transeast and AWL to comply with the ICMC. FFK has developed an audit protocol to assist in the subcontractor performance assessment.

PRINCIPLE 2 – INTERIM STORAGE

Design, Construct and Operate Cyanide Trans-shipping Depots and Interim Storage Sites to Prevent Releases and Exposures.

Interim Storage 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 **Interim Storage Practice 2.1**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 2.1; store cyanide in a manner that minimizes the potential for accidental releases.

The AWL interim storage facility is secured to prevent unauthorised access to cyanide, has appropriate warning signs (no smoking, eating and drinking, no naked flames and PPE requirements).

Incompatible materials such as acids, strong oxidisers and explosives are stored at a distance of more than 40 m from any cyanide held at the AWL interim storage facility.

Cyanide is stored within shipping containers that are designed to minimise the potential for contact of solid cyanide with water.

Cyanide stored with adequate ventilation to prevent build-up of hydrogen cyanide gas and the shipping containers are not opened while in storage and they are stored outside on a hardstand area.

Systems and resources are in place on the site to contain and remediate any spilled cyanide materials and minimise the extent of a release.

PRINCIPLE 3 – EMERGENCY RESPONSE

Ensure that Process Controls are Protective of the Environment.

Emergency Response Practice 3.1: **Prepare detailed emergency response plans for potential cyanide releases.**

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Emergency Response Practice 3.1**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

FFG has developed and implemented an Emergency Response Guide (CPERG) which forms an appendix to its Emergency Management document. FFK utilises this procedure.

The CPERG has been adapted by FFG from the supplier Orica's Emergency Response Guide. The Orica Emergency Response Guide was developed by Orica Mining Chemicals to provide guidance in the development of specific site and transport route emergency response plans for the management of incidents involving spillage of Orica sodium cyanide product. The document has been modified by FFG to suit the conditions of Kenya and Tanzania.

The CPERG has been developed to be appropriate for the selected transportation routes and interim storage facility and considers the physical and chemical form of cyanide and the design of the transport vehicle.

The CPERG covers specific circumstances where it will be used. The document includes Emergency Response Guides for specific scenarios including:

- RG1 Dry Sodium Cyanide Spill inside interim storage facility;
- RG2 Dry Sodium Cyanide Spill outside interim storage facility;
- RG3 Dry Sodium Cyanide Spill inside a Shipping container;
- RG4 Shipping container Decontamination;
- RG5 Handling Wet Sodium Cyanide;
- RG6 Dry Sodium Cyanide Spill to a Waterway;
- RG7 Decontamination of a Spill of Solid Cyanide into Soil; and
- RG8 Response to an Incident with a Fire Involving Sodium Cyanide.

External responders identified in the documents are aware of their role in an emergency.

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

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Emergency Response Practice 3.2**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Transeast and AWL provide the same training to their respective employees which is given by Transeast's Health and Safety Officer. All drivers transporting cyanide, AWL facility operators including handling equipment operators and banksmen receive the Cyanide Awareness course and the drivers received the Cyanide Convoy Procedures course.

The CPERG document identifies the key roles and responsibilities in the event of an emergency for the following positions:

- Convoy Leader;
- Convoy Truck Driver;
- Escort Personnel;
- Record Keeper;
- Communications Person;
- Interim storage facility Supervisor; and
- Interim storage facility Worker.

The requirements are clear and unambiguous and are also covered in the training programmes.

All emergency response equipment is taken in an Emergency Response vehicle as no other equipment is available en route. A list of emergency response equipment is documented on a checklist. The equipment is checked and tested before every convoy of vehicles leaves. The lists were viewed during the audit. In addition to the emergency response vehicles all drivers are issued with an 'escape' kit bag when the convoy assembles that includes essential PPE and an MSDS for sodium cyanide.

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

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Emergency Response Practice 3.3**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Section 1 Emergency Call List and Section 6 Plan Activation of the Cyanide Procedures Emergency Response Guide contains details on how the emergency response procedures are activated including details of who is contacted. This includes emergency personnel, internal personnel, the shipper, the receiver and the regulatory authorities.

A desk exercise test of the contact numbers for the police, hospital and the KPA fire brigade was undertaken in 2010.

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

☒ **in full compliance with**

The operation is
☐ in substantial compliance with **Emergency Response Practice 3.4**
☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The Emergency Response Guide RG 7 within the CPERG details the decontamination of a Spill of Solid Cyanide into Soil and also includes details what to do if water is impacted.

It includes a procedure for disposal of cyanide contaminated soil and wash water. It states that contaminated soil and spilt material will be disposed of at a mine site heap leach facility/tailings facilities. There are also procedures for dealing with a dry spill and for dealing with a wet spill.

The Emergency Response Guide RG 7 within the CPERG details the requirements for decontamination of a 'Spill of Solid Cyanide into Soil'. The document prohibits the use of chemicals ferrous sulphate, and hydrogen peroxide. The Emergency Guide recommends the use of sodium hypochlorite for use in soil contamination.

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

☒ **in full compliance with**

The operation is
☐ in substantial compliance with **Emergency Response Practice 3.5**
☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The CPERG contains provisions for periodically reviewing and evaluating its adequacy and they are being implemented.

In addition to this the Review and Audit Process Section of the CPERG states that the responsible people are required to coordinate a review at least annually, and after any of the following resulting from or affected by the transportation of cyanide:

- Incidents;
- Emergencies;
- Emergency exercises; and
- Transportation audits and assessments.

In the last three years one drill has been undertaken. The drill took place at Maji ya Chumvi area about 35 km from Mombasa along the Mombasa – Nairobi highway. The drill report includes a corrective action section and has dates for implementation of the actions. Roger Lucheli, the Health and Safety officer, plans

to have the CPERG updated as a result of the drill. FFK plan to undertake mock drills more frequently in the future and preferably at least one a year.

Report Signature Page

GOLDER ASSOCIATES (UK) LTD

Sophie Wheeler
ICMI Lead Auditor/Project Manager

Ed Clerk
Reviewer

Date: 17 August 2011

Author: Sophie Wheeler, Dale Haigh/EC/pr

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