



April 2015

## ICMI CERTIFICATION SUMMARY REPORT

# Golden Coach Ltd, Tanzania

**Submitted to:**

International Cyanide Management Institute  
(ICMI)  
1400 I Street, NW - Suite 550  
Washington, DC 20005  
UNITED STATES OF AMERICA

Golden Coach Ltd  
Nelson Mandela Road  
Dar es Salaam  
Tanzania

REPORT



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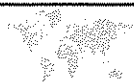
**Report Number.** 14514150069.503/A.2

**Distribution:**

ICMI - 2 copies (1 pdf)  
Golden Coach Ltd - 1 copy (pdf)  
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## ICMI CERTIFICATION SUMMARY REPORT

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## ICMI CERTIFICATION SUMMARY REPORT

### 1.0 SUMMARY AUDIT REPORT FOR TRANSPORTATION

**Name of Cyanide Transportation Facility:** Golden Coach Ltd  
**Name of Facility Owner:** Golden Coach Ltd  
**Name of Facility Operator:** Golden Coach Ltd  
**Name of Responsible Manager:** Ali Dewji, Golden Coach Ltd  
**Address:** Golden Coach Ltd,  
P.O. Box 38322 Nelson Mandela Road  
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Tanzania  
**State/Province:** Dar es Salaam  
**Country:** Tanzania  
**Telephone:** +255 (0)22 286 2486  
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**E-Mail:** mrdewji@goldentz.com

### 2.0 LOCATION DETAIL AND DESCRIPTION OF OPERATION

#### 2.1 Facility Location and Background

Golden Coach Ltd (GCL) became a Signatory to the International Cyanide Management Code on 27 May 2014.

With their sister company, Golden Fleet Ltd (GFL), a wholly owned subsidiary of GCL, they have been in operation for over 30 years and located off Nelson Mandela Road at coordinates 6°50'59.57"S - 39°15'49.21"E in Dar es Salaam. Golden Fleet Ltd acts as a subcontractor to Golden Coach Ltd with regards to the transport of cyanide with GFL providing some of the trucks and drivers.

Golden Coach Ltd's main client is Freight Forwarders Tanzania Ltd. There has been a close working relationship between GCL, FFT and Mainline Carriers Limited, a sub contractor to FFT, in the transportation of Cyanide since 2003.

GCL has a fleet of over 200 trucks and 220 trailers and provides services throughout Tanzania and its neighbouring countries such as Kenya, Uganda, Burundi, Rwanda, DRC and Zambia. The company specialises in bulk, break-bulk and containerised cargo deliveries. Services offered by GCL include:

- General cargo haulage;
- Abnormal/out of gauge cargo haulage;
- Hazardous goods haulage; and
- Consolidated cargo haulage.

The company maintains its vehicles at its own workshop which was visited as part of the audit. It has preventive maintenance systems in place to ensure that vehicles are checked regularly.

Golden Coach Ltd  
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Signature of Lead Auditor

1 April 2015  
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### SUMMARY AUDIT REPORT

#### Auditors Findings

**Golden Coach Ltd is:**

☒ in full compliance with

☐ in substantial compliance

☐ not in compliance with

**The International  
Cyanide Management  
Code**

**Audit Company:** Golder Associates  
**Audit Team Leader:** Dale Haigh, Lead Auditor and Technical Specialist  
**Email:** dhaigh@golder.com

#### Name of Other Auditors

Name, Position	Signature
Ed Perry, ICMI Pre-certified Auditor	

#### Dates of Audit

The Certification Transport Audit was undertaken over two days (two person-days), 24 and 25 September 2014.

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.

Golden Coach Ltd

Name of Facility




Signature of Lead Auditor

1 April 2015

Date

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## ICMI CERTIFICATION SUMMARY REPORT

### 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:**

The operation is in full compliance with Transport Practice 1.1; select cyanide transport routes to minimize the potential for accidents and releases.

GCL, with its carriers GFL and clients have implemented a procedure for the transport route selection to minimise potential for accidents and releases, in an environment where there are limited practical alternative transport routes.

It is planned for the transport routes to be periodically reviewed and analysed for risks and restrictions and numerous actions were identified and implemented to improve safety. Drivers will assess and report on conditions during each trip. GCL, its clients and suppliers have consulted various stakeholders and applicable governmental agencies and will continue to do so in the future in the selection of routes and development of cyanide management measures.

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

GCL largely manages its own emergency response but has contacted emergency support (Police and Hospitals) along the route each year. These stakeholders were consulted on cyanide and advised of their roles during an emergency.

GCL subcontracts part of the transport of cyanide to GFL under Service Level Agreements. The Service Level Agreements require GFL to comply with the ICMC.

**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:**

The operation is in full compliance with 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.

GCL and its subcontractor GFL only uses trained and competent operators to drive its trucks and the companies maintain files on their drivers that contain copies of licences (heavy vehicle drivers licences) and training records. GCL maintains copies of the files on drivers used by its subcontractors.

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There is no requirement in Tanzania for drivers to be licensed for dangerous goods transport. However, all personnel from GCL 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 managed by GCL.

Interviews with drivers at GCL indicated that all GCL 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.

GCL subcontracts part of the transport of cyanide to GFL under a Service Level Agreement. The Service Level Agreements requires GFL to comply with the ICMC.

**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:**

The operation is in full compliance with Transport Practice 1.3; ensure that transport equipment is suitable for the cyanide shipment.

GCL/GFL only use equipment designed and maintained to operate within the parameters of the cyanide loads it will be handling. Cyanide manufacturers and suppliers limit the mass of cyanide containers sent to Tanzania to 23 tonnes. This is clearly shown on the chain of custody information provided with each shipment.

GCL/GFL carries out maintenance of vehicles (including tractor and trailer) on a regular basis. They reported that maintenance is performed after each cyanide convoy and this was verified on review of vehicle maintenance records at GCL/GFL. At GCL/GFL records are retained for each vehicle and filed by vehicle registration number. Records held at each location confirmed the frequency of maintenance was high.

GCL/GFL has procedures in place to prevent overloading of the transport vehicles being used for handling cyanide.

GCL/GFL and its trailer suppliers (Simba Trailers) have determined that the maximum trailer loading capacity is 50 tonnes. However, the load carried is restricted by the Motor Vehicle Registration certificates for the cyanide carrying trailers which were inspected and the loading capacity of the trailers shown to be 29 tonnes. The Tanzanian loading capacity allowed on roads is 27 tonnes. Cyanide manufacturers and suppliers cyanide containers supplied to GCL/GCF are just less than 23 tonnes.

GCL/GFL has stated in training that no additional loading should be added to the cyanide loaded trailers. GCL/GFL's training also states that only one cyanide container can be loaded onto each trailer. These aspects are re-enforced within training provided to all parties involved within the convoy (Convoy leaders, emergency response and cyanide load drivers).

Prior to the start of each convoy and during the convoy, loads are checked by the drivers and convoy leaders and this is documented each day.

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### 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:

The operation is in full compliance with Transport Practice 1.4; develop and implement a safety program for transport of cyanide.

GCL has implemented procedures that ensured 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 twist locks and frequent inspection that the secure attachment remains in place during the convoy.

Signs and placards are used 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 that were purchased to a design specification appropriate to carry the cyanide containers. GCL has developed a Safety Program which is implemented in conjunction with GCL. This includes vehicle inspections prior to each shipment and preventive maintenance activities. Limitations on driver hours are also managed; locally through use of 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 been followed to prevent loads from shifting. Procedures are also in place for modifying or suspending travel during severe weather and the convoy leaders assess conditions and can take appropriate action.

GCL has drug prevention policies. Records are maintained for all aspects of the Safety Program.

### 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:

The operation is in full compliance with transport Practice 1.5; follow international standards for transportation of cyanide by sea and air as the transporter does not ship cyanide by air.

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

☒ in full compliance with

The operation is

☐ in substantial compliance with


Transport Practice 1.6

☐ not in compliance with

#### Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 1.6; track cyanide shipments to prevent losses during transport.

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GCL/GFL has effective means of communication with their transport vehicles. Communication systems include GPS tracking which is used for all cyanide shipments; and the use of long-range cell phones which are continuously on. Satellite phones are carried by convoy leaders from GCL and these may be used if there is a failure in the cell phone signal. All communication equipment is checked during the convoy pre-checks prior to the start of each convoy.

GCL/GFL has appropriate inventory controls and/or chain of custody documentation to prevent loss of cyanide during shipment. Vehicles are also weighed at weighbridge stations along the route which verifies that no material is lost. All trucks carry a material safety datasheet for sodium cyanide in the language of the workforce (Swahili).

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### 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.

☒ in full compliance with

The operation is

☐ in substantial compliance with


Interim Storage Practice 2.1

☐ not in compliance with

##### Summarise the basis for this Finding/Deficiencies Identified:

Transport Practice 2.1 is not applicable as GCL does not undertake any interim storage of cyanide.

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### 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.

☒ in full compliance with

The operation is

☐ in substantial compliance with

Emergency Response Practice 3.1

☐ not in compliance with

##### Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 3.1; prepare detailed emergency response plans for potential cyanide releases.

GCL have a document entitled Cyanide Procedures that contains all of the details of how to respond in an emergency that involves cyanide.

The Cyanide Procedures document has been adapted by GCL from Orica Australia Limited's (Orica) Emergency Response Guide. The Orica Emergency Response Guide provides guidance in the development of specific site and transport route emergency response plans for the management of incidents involving spillage of sodium cyanide product. The document has been modified by GCL to suit the conditions of East and Central Africa.


The Cyanide Procedures document has been developed to be appropriate for the selected transportation routes and interim storage facility, transport infrastructure, the physical and chemical form of cyanide and the design of the transport vehicle.

The Cyanide Procedures cover specific circumstances where they 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 sea container;
- RG4 sea 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.

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### 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:

The operation is in full compliance with Transport Practice 3.2; designate appropriate response personnel and commit necessary resources for emergency response.

GCL provide cyanide training to their employees which is provided by their HSE co-ordinator. The emergency response training is given to all appropriate personnel. All drivers transporting cyanide receive a Cyanide Awareness course which is then followed periodically by Cyanide Convoy Procedures.

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

- Cyanide Code Manager
- Cyanide Convoy Leader;
- Emergency Response (ER) Truck Driver;
- Convoy Lead Drivers
- Local Authorities.
- Interim Storage Yard Supervisor; and
- Interim Storage Yard Worker.

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

All emergency response equipment is taken in the Emergency Response vehicles as no other equipment is available on route. A list of emergency response equipment is documented on a checklist. The equipment is checked and tested before every convoy of vehicles leaves. All drivers are issued with a 'Get Out Alive' kit bag when the convoy assembles that includes essential PPE and an MSDS for sodium cyanide written in Swahili.

### 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:

The operation is in full compliance with Transport Practice 3.3; develop procedures for internal and external emergency notification and reporting.

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The Emergency Call List and Plan Activation sections of the Cyanide Procedures contain 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 test of the numbers of the internal and external responders is undertaken annually through a Community Awareness road trip and the Cyanide Procedures updated in response to this.

### 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 operation is in full compliance with Transport Practice 3.4; develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

The Emergency Response Guide RG 6 Dry Sodium Cyanide Spill to a Waterway (part of the Cyanide Procedures) states that GCL "subscribes to the recommendations of the International Cyanide Management Code in that no chemicals are to be added to a flowing waterway in the event of a cyanide spill as these may only exacerbate the situation with their own toxicity characteristics."

RG 7 'Decontamination of a Spill of Solid Cyanide into Soil' (part of the Cyanide Procedures) recommends the use of sodium hypochlorite for use where there has been contamination of the soil.

Ferrous sulphate and hydrogen peroxide are not carried by the convoy as part of their spill kit.

### 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 operation is in full compliance with Transport Practice 3.5; periodically evaluate response procedures and capabilities and revise them as needed.

The Cyanide Procedures document 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 Cyanide Procedures 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;

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- Emergency exercises; and
- Transportation audits and assessments.

A full scale incident scenario was undertaken on 13 June 2014 jointly between FFT and GCL. The Cyanide Emergency Drill Report for this was observed.

The drill involved a simulated vehicle incident and associated cyanide spill. The drill took place on one truck in a 16 truck convoy. The drill involved Morogoro Regional Police. Following the drill the write up included areas where improvements could be made which included additional training requirements. Since the drill a number of these training requirements have been undertaken and others are planned.

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### Report Signature Page

**GOLDER ASSOCIATES (UK) LTD**

Dale Haigh  
Lead Auditor/Transportation Technical Specialist

Sophie Wheeler  
Project Manager/Reviewer

Date: 1 April 2015

DH/EP/SW/pr

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