REPORT

International Cyanide Management Code

Rocky's Own Transport Co, Transport Certification Audit, Summary Audit Report - Australian Supply Chain

Submitted to:

International Cyanide Management Institute

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Submitted by:

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Distribution List

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Important Information

1.0 INTRODUCTION

1.1 Operational information

Name of Transportation Facility: Australian road transport route

Name of Facility Owner: Lake Fox Pty Ltd

Name of Facility Operator: Rocky's Own Transport Company

Name of Responsible Manager: Bryan Smith

Address: 18 Power Street, Queensland 4701

State/Province: Queensland

Country: Australia

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1.2 Audit Scope

The scope of this Audit includes road transportation of cyanide from Orica Australia Pty Ltd's (Orica) cyanide manufacturing facility in Yarwun, Queensland (QLD) to mine sites within QLD, New South Wales (NSW) and Western Australia (WA).

1.3 Description of Operations

Rockys Own Transport Company (ROTC) is an Australian subsidiary company of Lake Fox Ltd. ROTC was established in 1985 to provide national logistic services throughout Australia. It has depots in depots in Rockhampton, Wacol, Helidon, Yarwun and Kalgoorlie in Western Australia that house over 230 staff, 117 trucks and 180 trailers.

ROTC currently transports dangerous goods as part of their Bulk Dangerous Goods Division and has expanded this service to include cyanide transportation for Orica.

ROTC uses all their own staff, trucks and trailers to transport cyanide.

1.4 Road Transportation

ROTC transports cyanide manufactured by Orica Australia Pty Limited (Orica) who is a Code certified producer. Transportation occurs within Qld, NSW and WA, Australia.

1.5 Trans-shipping and interim storage

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol.

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1.6 Auditors Findings and Attestation

☒ **in full compliance with**

ROTC is: ☐ in substantial compliance with **The International Cyanide Management Code**

☐ not in compliance with

No significant cyanide exposures or releases were noted to have occurred during ROTC's Certification audit.

Audit Company: Golder Associates Pty Ltd

Audit Team Leader: Jaclyn Ennis-John, Exemplar Global (110895)

Email: jennisjohn@golder.com.au

1.7 Name and Signatures of Other Auditors:

Name	Position	Signature	Date
Jaclyn Ennis-John	Lead Auditor and Transport Technical Specialist		6 July 2018

1.8 Dates of Audit

The ICMC Certification Audit was conducted over three days between 21 and 23 February 2018 at ROTC facilities in QLD.

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 *Cyanide Transportation Verification Protocol for the International Cyanide Management Code* and using standard and accepted practices for health, safety and environmental audits.

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2.0 CONSIGNOR SUMMARY

2.1 Principle 1 – Transport

Transport Cyanide in a manner that minimises the potential for accidents and releases.

2.1.1 Transport Practice 1.1

Select cyanide transport routes to minimise the potential for accidents and releases.

	☒ **in full compliance with**	
ROTC is:	☐ in substantial compliance with	**Transport Practice 1.1**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

ROTC is FULLY COMPLAINT with Transport Practice 1.1 which requires transporters to select cyanide transport routes to minimise the potential for accidents and releases.

ROTC implements a process for selecting transport routes that minimises the potential for accidents and releases or the potential impacts of accidents and releases. ROTC has a procedure for developing a Journey Management Plan (JMP) which sets out the general requirements for the development of a JMP, the requirements for changing routes in the event of adverse conditions impacting on the approved routes and emergency based alternate routes required to maintain supply.

ROTC has implemented a process to evaluate the risks of selected cyanide transport routes and take the measures necessary to manage these risks. The JMPs document the hazards/threats identified and detail the control measure/s for the hazards.

A Safe Driving Plan (SDP) is provided to the driver for every scheduled trip. The SDP is developed in accordance with the JMP and has additional risk information for the driver to review, follow and complete as required. As part of the ongoing risk management processes to assist drivers who are not regularly travelling a particular route, each trip that is driven, the driver is required to document any new hazards or conditions on the route that has added risk on the route.

ROTC has a process to periodically re-evaluate routes used for cyanide deliveries. The CTMP and document control requirements state that the CTMP and associated risk assessments, JMPs and procedures are to be reviewed in accordance with ROTC Document Control every three years or following trigger events.

The *Journey Management Plan Development Procedure* details the measures taken to address risks identified with the selected routes. ROTC has implemented a JMP process that summarises and documents the control measure/s for the individual route including preparation, unscheduled stoppages and alternative routes.

ROTC seeks input from communities, other stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures. Within Australia, cyanide can only be transported along government-designated dangerous goods routes.

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Direct engagement of communities by ROTC within Australia did not occur for the following reasons:

- The community has the opportunity to comment during the designation of dangerous goods routes.
- The community was not designated a role as part of the planned response to an emergency involving cyanide, negating the need for community consultation on this issue.
  The risk management measures implemented for the cyanide transportation are considered a high standard and negate the need for community consultation in the development of such measures.

ROTC has assessed its routes and considered that no routes require specific additional control measures for special safety or security consideration.

ROTC does not subcontract any of its cyanide transport operations within the scope of this audit.

2.1.2 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**	
ROTC is:	☐ in substantial compliance with	**Transport Practice 1.2**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

ROTC is FULLY COMPLAINT with Transport Practice 1.2 which requires that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

ROTC only uses trained, qualified and licensed operators for its transport vehicles. All drivers undertaking cyanide transport must have a government issued current driver's license with the relevant category along with mandatory internal training.

Internal training covers a range of training including ROTC's standards and procedures. The minimum training requirements for ROTC and employees involved in the transportation of sodium cyanide is addressed in *Sodium Cyanide Training Procedure* and covers all positions. The training requirements detailed are specific to a role and for drivers include the unloading and loading of cyanide systems and sparging.

The *Sodium Cyanide Training Procedure* also details the training process and the main steps involved. Each new driver is assigned a mentor and undergoes training and coaching and assessments where required. Training requirements area identified are detailed in each individuals *Sodium Cyanide Training Plan.*

ROTC monitors its training records through the annual reporting process. Copies of these records are kept in the Freight 2020 database and Depot Training Matrices.

A review of ROTC's driver training records, the training matrix spreadsheet and interviews with drivers confirmed that training is provided and licensed and trained drivers are used for cyanide transport.

All personnel operating cyanide transport equipment have been trained to perform their jobs in a manner that minimises the potential for cyanide releases and exposures.

2.1.3 Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

	☒ **in full compliance with**	
ROTC is:	☐ in substantial compliance with	**Transport Practice 1.3**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

ROTC is FULLY COMPLAINT with Transport Practice 1.3 which requires that transport equipment is suitable for the cyanide shipment.

The operation only uses equipment designed and maintained to operate within the loads it will be handling when transporting cyanide.

The operation maintains a dedicated fleet of prime movers and trailers to transport cyanide freight containers, sparges and ISO tanks. Vehicle specifications are recorded in a vehicle list register in accordance with ROTC's Maintenance Management Manual (MAN PLA 001) and Vehicle List Procedure.

ROTC operate under the National Heavy Vehicle Accreditation Scheme (NHVAS) and the maintenance requirement to maintain the Mass Management specifications (OPS FOR 007 – Vehicle Mass Verification) to allow for additional load weight capacity. OPS FOR 007 is used for all new jobs to predetermine loading for containers. All ROTC's vehicles involved in the transportation of cyanide are subject to Maintenance Management Accreditation Servicing as part of the NHVAS.

ROTC implements documented daily vehicle inspections or pre-trip checks under the Chain of Responsibility legislation and preventative maintenance.

Preventative Maintenance is undertaken for all trucks on an 'ABC' scheme in accordance with the Maintenance Management Manual (MAN PLA 001) in conjunction with the equipment manufacturer's specifications and requirements.

A review of maintenance records for fleet vehicles that conducted cyanide transport during the period confirmed that preventative maintenance activities had been conducted in accordance with ROTC procedures.

There are procedures to verify the adequacy of the equipment for the load it must bear. There are procedures for maintenance which include compliance with annual inspection process for vehicle certification for the transport of dangerous goods issued by local government. Part of the inspection process is to confirm vehicles are meeting manufacturer's specifications for load bearing.

ROTC has a *Mass Verification Procedure* which outlines the vehicle mass validation process and schedule, based on the NHVAS. The mass validation process specifies the activity, key steps and safety/quality for loading of vehicles.

Procedures are in place to prevent overloading of the transport vehicle being used for handling cyanide. Vehicle specifications are recorded in a vehicle list register in accordance with ROTC's Maintenance Management Manual and Vehicle List Procedure. The register maintains information on all ROTC vehicles authorised to transport cyanide products.

The NHVAS also provides compliance to regulations that dictate the loading of a transport vehicle.

Every vehicle that is loaded in a ROTC depot that has a weighbridge must complete a weight verification to ensure that it is not overloaded or exceeding an axel group weight limit. Vehicle configurations that are loaded at a customer site that has a weighbridge are required to have the axel weight verifications completed in line with the verification schedule outlined in *the Mass Verification Procedure*.

2.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

	☒ **in full compliance with**	
ROTC is:	☐ in substantial compliance with	**Transport Practice 1.4**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

ROTC is FULLY COMPLAINT with Transport Practice 1.4 which requires the development and implementation of a safety program for transport of cyanide.

ROTC has procedures in place so that cyanide is transported in a manner that maintains the integrity of the producer's packaging.

Cyanide product is loaded and sealed by the producer and ROTC has procedures in place to check seals on all vessels and containers. All security seals are inspected as part of the load receival and during the course of the journey. Security seal inspections are part of the ongoing checks when the vehicle is parked for rest breaks. Any missing seals are reported and investigated. Lost or damaged seals are replaced prior to recommencing the journey.

Typically, containers are bolt sealed with numbers recorded and checked; liquor ISO tanks are sealed with locks and solid bulk storage units (sparges or ISOs) are sealed with numbered wire security seals. These security seals are inspected as part of the regular inspection of the storage location and the records are maintained appropriately.

ROTC uses placards or other signage to identify the shipment as cyanide, as required by local regulations and international standards.

The placards used include:

- UN Numbers
- Dangerous Goods Class labels
- Shipping Name of the product being carried
- Emergency response (hazchem) code
- Contact details for emergency response assistance
- Contact details for specialist advice.

The ROTC pre-trip checks include checks on placarding for the presence of dangerous goods class diamonds and EIP signage is in place, correct, clean and legible. Loaded containers inspected during the site visit conformed to these requirements.

ROTC implements a safety programme for cyanide transport that includes:

a) Vehicle inspections prior to each departure/shipment?

Vehicle inspections prior to each departure are undertaken by the driver.

b) A preventative maintenance program?

ROTC's vehicles involved in the transportation of cyanide are subject to Maintenance Management Accreditation Servicing as part of the NHVAS. ROTC preventative maintenance is undertaken for all trucks on an "ABC" scheme in accordance with the Maintenance Management Manual in conjunction with the equipment manufacturer's specifications and requirements. A review of maintenance records confirmed preventative maintenance activities are undertaken.

c) Limitations on operator or drivers' hours?

All operations are conducted to align with the Advanced Fatigue Management Plan. Drivers complete a Safe Driving Plan that defines and records rest breaks and driving time.

The operation also uses in vehicle management systems to monitor vehicle operation times and driver fatigue. The operation has fitted driver fatigue assessment systems all vehicles that provide feedback to the driver and the operation should driver attention be reduced.

d) Procedures to prevent loads from shifting?

Whilst in transit, sodium cyanide is secured by the supplier through varying methods, dependent on packaging types. Typically, containers are bolt sealed with numbers recorded and checked; liquor ISO tanks are sealed with locks and solid bulk storage units (sparges or ISO's) are sealed with numbered wire seals. These security seals are inspected as part of the regular inspection of the storage location and the records are maintained appropriately.

e) Procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered?

The JMP provides a quick summary of actions to be taken should an alternative route be needed or an unscheduled stop. The Driver Transport Emergency Response Guide outlines actions for emergency response situation which could include civil unrest. The vehicles have duress alarms and means of contacting base and the police for assistance.

Severe weather conditions are monitored, which also includes consideration of road conditions and road closures.

f) A drug abuse prevention program?

All ROTC employees are subject to the *Workplace Behaviour Policy and the Drug and Alcohol Program*. Operators of all employment types are required to participate in mine site and production facility drug and alcohol testing programs as required.

ROTC has a Drug and Alcohol Policy, and a Drug and Alcohol Program that consists of a formal policy and sampling program. All personnel may be selected as part of the random drug sampling programme for an analysis. Records are maintained and were sited in the Freight 2020 database system.

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g) Retention of records documenting that the above activities have been conducted?

Records are maintained for the above activities, as evidence that they have been conducted. Maintenance records, inspection and convoy records were sampled during through the audit period.

2.1.5 Transport Practice 1.5

Follow international standards for transportation of cyanide by sea and air.

	☒ **in full compliance with**	
ROTC is:	☐ in substantial compliance with	**Transport Practice 1.5**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

- Transport Practice 1.5 requiring the operation follow international standards for transportation of cyanide by sea and air is NOT APPLICABLE to ROTC.
- ROTC does not intend to transport consignments of cyanide by sea or air within the scope of this audit.

2.1.6 Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

	☒ **in full compliance with**	
ROTC is:	☐ in substantial compliance with	**Transport Practice 1.6**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

ROTC is FULLY COMPLAINT with Transport Practice 1.6 which requires the tracking of cyanide shipments to prevent losses during transport.

ROTC's transport vehicles have means to communicate with the transport company, the mining operation, the cyanide producer or distributor and/or emergency responders.

All vehicles have comprehensive communications systems that include GPS tracking (Skynet), and mobile (GSM) and Ballistic truck phones (satellite) are on for the duration of each trip and are an integral part of the communication networking within the transportation system.

Sodium cyanide transportation routes are route assessed and approved, some of the more remote routes are susceptible to communication 'black spots'. Where a black spot in communication has been identified during the route assessment process, the *Loan and Isolated Works Procedure* is utilised to assist in managing the communication risk. The occurrence of black spot areas is offset by the presence of satellite tracking and satellite phone systems installed within the trucks. In the event that a driver is unable to use the mobile (GSM) phone to communicate with ROTC, the satellite phone (Ballistic) is used.

All vehicles used to transport sodium cyanide are fitted with emergency duress systems.

ROTC periodically tests the communication equipment (i.e. mobile and satellite phones) to ensure it functions properly. The GPS tracking system (Skynet) is tested quarterly by the Compliance Officer. Satellite phones, duress buttons and driving cameras are checked prior to each delivery as part of the pre-trip checks.

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ROTC has procedures to track the progress of cyanide shipments. These include:

- Advising consignees when shipments leave the production facility and estimated time or date of arrival of the consignment.
- Use of satellite tracking, mobile and satellite phone systems to monitor progress along the routes.
- Procedures to alert managers of deviations from designated routes or changes in activity.

ROTC has appropriate inventory controls and/or Chain of Custody documentation to prevent loss of cyanide during shipment. Inventory controls are the primary method of preventing product loss during shipment. These controls include:

- Consignments are identified and documented (individual IBCs are identified by number, and each freight container and each isotainer number is recorded).
- All containers are locked with seals and the seal numbers are recorded and checked by the consignee. Seals are also checked at transfer locations and on route.
- The shipments are weighed when leaving the production facility and again when arriving at the mine site.
- The identifying container numbers are transmitted to the consignee and are checked off by the representative (driver) and consignee at the point of delivery.

Shipping records indicating the amount of cyanide in transit and Safety Data Sheets (SDS) are available during transport.

A review of delivery documentation together with pre-trip check documentation confirmed that the amount of cyanide on each vehicle is recorded.

There is a copy of the Cyanide Transport Management Plan, Driver Transport Emergency Response Guide and SDS within the cabin of each vehicle.

2.2 Principle 2 – Interim Storage

Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures.

2.2.1 Transport Practice 2.1

Store cyanide in a manner that minimises the potential for accidental releases.

	☒ **in full compliance with**	
ROTC is:	☐ in substantial compliance with	**Transport Practice 2.1**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

Transport Practice 2.1 requiring cyanide to be stored in a manner that minimises the potential for accidental releases is NOT APPLICABLE to ROTC.

There are no trans-shipping depots or interim storage sites as defined in the audit protocol within the scope of this audit.

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2.3 Principle 3 – Emergency Response

Protect communities and the environment through the development of emergency response strategies and capabilities.

2.3.1 Transport Practice 3.1

Prepare detailed Emergency Response Plans for potential cyanide releases.

ROTC is:

☒ **in full compliance with**

☐ in substantial compliance with **Transport Practice 3.1**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

ROTC is FULLY COMPLAINT with Emergency Response Principle 3.1 which requires detailed Emergency Response Plans for potential cyanide releases.

There are no interim storage sites as defined in the audit protocol within the scope of this audit. ROTC's *Driver Transport Emergency Response Guide* has been developed specifically for road transportation.

The management of cyanide related emergencies such as potential cyanide releases, is addressed in the *Driver Transport Emergency Response Guide*. The document is used to guide the actions of drivers in the event of a cyanide related emergency that may be encountered along the transportation route. The Driver Transport Emergency Response Guide covers all transport movements controlled by ROTC.

The *Driver Transport Emergency Response Guide* provides actions and responsibilities specifically for drivers.

There are procedures for response to general transport emergencies (i.e. bush fire, vehicle breakdown, minor/major vehicle accident, vehicle cabin fire etc.), and transport emergencies involving Class 5.1 oxidising agents, Class 1 explosives, sodium cyanide and chlorine.

The *Driver Transport Emergency Response Guide* breaks down what to do in the following sodium cyanide emergencies:

- Vehicle Accidents – Minor and major vehicle accidents
- Loss of Containment Sodium Cyanide Solids (UN 1689)
- Loss of Containment Sodium Cyanide Liquids (UN 3414).

ROTC's *Driver Transport Emergency Response Guide* is appropriate for the selected transportation route. The guide does consider both the physical and chemical form of cyanide. The guide breaks down what drivers must do in emergencies such as loss of containment sodium cyanide solids (UN 1689) and liquids (UN 3414).

The consideration of transport infrastructure has also been undertaken by ROTC through route risk assessments and route assessments via the development of JMPs. Route assessments detail the condition of the road, traffic hazards, intersections and issues to be managed by the driver along the route.

The *Driver Transport Emergency Response Guide* does include descriptions of response actions, as appropriate for the anticipated emergency situation.

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The *Driver Transport Emergency Response Guide* does identify the role of emergency responders by using the national emergency number (000). Specific responder actions are not detailed in the guide as State Government emergency response agencies assume control of an incident initially until satisfied that public safety is no longer a concern.

All cyanide products in Australia contain an Emergency Information Panel which lists the State emergency services number (i.e. Police, Ambulance and Fire Brigade) and the producers ERS contact number. The national emergency services number (000) is always listed as a first point of contact. The producers ERS is for technical advice in the event of an emergency.

The *Emergency and Crisis Management Plan* provides actions and responsibilities for personnel in the event of cyanide related emergencies.

2.3.2 Transport Practice 3.2

Designate appropriate response personnel and commit necessary resources for emergency response.

	☒ **in full compliance with**	
ROTC is:	☐ in substantial compliance with	**Transport Practice 3.2**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

ROTC is FULLY COMPLAINT with Emergency Response Principle 3.2 which requires appropriate response personnel and necessary resources for emergency response.

ROTC does provide emergency response training of appropriate personnel.

Management facilitate resources to make drivers available for emergency response training and refresher training as required.

ROTC coordinate field and desktop exercises in consultation with the cyanide producer on a regular basis to review emergency response skills and to highlight any deficiencies in the plans or the operators understanding. Any deficiencies are recorded with corrective actions to be implemented.

Mock emergency drills with debriefs are held periodically as part of ROTC's training and evaluation process.

The Emergency and *Crisis Management Plan* does describe the specific emergency response duties and responsibilities of personnel for response in emergency events.

The responsibilities for drivers in the event of an emergency situation that may be encountered during the course of transporting cyanide are identified in the *Driver Transport Emergency Response Guide* (SEC PRO 001). Tables 10.1, 10.2 and 10.3 of the guide outline the driver's responsibilities in the event of vehicle accidents, loss of containment sodium cyanide solids (UN1689) and loss of containment sodium cyanide liquids (UN 3414) respectively.

ROTC implements a Sodium Cyanide Vehicle Audit Form, which is an inspection checklist that the driver completes prior to departure. The audit form provides a list of all emergency response equipment that should be available during transport, including emergency response equipment.

ROTC has available the necessary emergency response and health and safety equipment, including personal protective equipment during transport.

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ROTC provides initial induction training on cyanide and PPE awareness to all staff and emergency response procedures for all staff with defined responsibilities in the *Driver Transport Emergency Response Guide*.

The *Sodium Cyanide Training Procedure* also details the training process and the main steps involved. Each new driver is assigned a mentor and undergoes training and coaching and assessments where required. Training requirements area identified are detailed in each individuals *Sodium Cyanide Training Plan.*

ROTC monitors its training records through the annual reporting process. Copies of these records are kept in the Freight 2020 database and Depot Training Matrices.

Mock emergency drills with debriefs are held periodically as part of ROTC's training and evaluation process.

Interviews with drivers and the review of training records confirmed that refresher training is provided in the response procedures provided in the *Driver Transport Emergency Response Guide.*

ROTC does have procedures to check emergency response equipment.

ROTC implements a *Cyanide Vehicle Checklist* that the driver completes prior to departure. This checklist includes a check on emergency response equipment, including the PPE bag.

A visual inspection was also made of the PPE equipment on several transport vehicles. The specified equipment was present and in serviceable condition.

2.3.3 Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

	☒ **in full compliance with**	
ROTC is:	☐ in substantial compliance with	**Transport Practice 3.3**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

ROTC is FULLY COMPLAINT with Emergency Response Principle 3.3 which requires the development of procedures for internal and external emergency notification and reporting.

ROTC has procedures and current contact information for notifying the shipper, the receiver/consignee, regulatory agencies, outside response providers, medical facilities and potentially affected communities of an emergency.

The emergency plans require notification of the manufacturer/supplier and refers to the Emergency Contacts and Recovery Register for specific contacts.

During an emergency the drivers would access their Duress Alarm which would alert the Depot who would call 000 and Orica and any other services required. All contact numbers are listed on the *Emergency Contacts and Recovery Register.* Additionally, the EIP has the Orica ERS listed.

The role of cyanide manufactures ERS services is one of communication. ERS operates 24 hours a day providing telephone advice and assistance to the public, emergency services and others on incidents relating to the transport, storage and use of chemical products and raw materials in emergency situations.

ROTC has provisions to ensure that internal and external emergency notification and reporting procedures are kept current.

ROTC has a Document Review Procedure and a Change Management Approval Planner which identify the requirements and other processes which need to be addressed should a change occur. This process would ensure any changes in the document would identify the requirement to update hard copies of documents in vehicles.

Inspection of vehicles identifies that all plans were current.

2.3.4 Transport Practice 3.4

Develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

	☒ **in full compliance with**	
ROTC is:	☐ in substantial compliance with	**Transport Practice 3.4**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

ROTC is FULLY COMPLAINT with Emergency Response Principle 3.4 which requires the development of procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

ROTC does not undertake the remediation or recovery of cyanide as this is managed through their relationship with cyanide manufactures. In the event of a cyanide emergency ROTC will contact the relevant product supplier and their product specialists will assist emergency services as needed. Any disposal will be developed in consultation with the manufacturer/supplier, mine sites and government authorities.

The Orica *Emergency Response Guide – Sodium Cyanide* includes procedures for remediation, such as recovery or neutralisation of solutions or solids, decontamination of soils or other contaminated media and management of spill clean-up debris.

Interviews and a review of delivery documentation confirmed that only Orica product is transported.

ROTC does not undertake the remediation or recovery of cyanide as this is managed through their relationship with cyanide manufactures. In the event of a cyanide emergency ROTC will contact cyanide manufactures and their product specialists will assist emergency services as needed.

Orica is a certified producer and transporters under the Code.

2.3.5 Transport Practice 3.5

Periodically evaluate response procedures and capabilities and revise them as needed.

ROTC is:

☒ **in full compliance with**

☐ in substantial compliance with **Transport Practice 3.5**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

ROTC is FULLY COMPLAINT with Emergency Response Principle 3.5 which requires ROTC to periodically evaluate response procedures and capabilities and revise them as needed.

All emergency plans contain provisions for periodically reviewing and evaluating the plan's adequacy and they are being implemented. As required with the Document Control System, it is reviewed every two years.
A review is also triggered by the following:

- Emergency response exercises
- Changes to business activities
- Incident investigation reports and recommendations
- Legislative or code change for Dangerous and security sensitive goods.

All change recommendations associated with reviews and events are to be managed using the COR FOR 023 – Change Management Approval Planner.

The emergency plans contain provisions for periodically conducting mock emergency drills and they are being implemented. Several mock exercises have been held over the past several years for dangerous goods.

There is a procedure to evaluate the TERPs performance after its implementation and revise it as needed.

All change recommendations associated with reviews and events are to be managed using the COR FOR 023 – Change Management Approval Planner.

3.0 IMPORTANT INFORMATION

Your attention is drawn to the document titled – “Important Information Relating to this Report”, which is included in Appendix A of this report. The statements presented in that document are intended to inform a reader of the report about its proper use. There are important limitations as to who can use the report and how it can be used. It is important that a reader of the report understands and has realistic expectations about those matters. The Important Information document does not alter the obligations Golder Associates has under the contract between it and its client.

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Signature Page

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ICMC Lead Auditor & Transportation Expert

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APPENDIX A

Important Information

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At any location relevant to the Services conditions may exist which were not detected by Golder, in particular due to the specific scope of the investigation Golder has been engaged to undertake. Conditions can only be verified at the exact location of any tests undertaken. Variations in conditions may occur between tested locations and there may be conditions which have not been revealed by the investigation and which have not therefore been taken into account in this Report.

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Having regard to the matters referred to in the previous paragraphs on this page in particular, carrying out the Services has allowed Golder to form no more than an opinion as to the actual conditions at any relevant location. That opinion is necessarily constrained by the extent of the information collected by Golder or otherwise made available to Golder. Further, the passage of time may affect the accuracy, applicability or usefulness of the opinions, assessments or other information in this Report. This Report is based upon the information and other circumstances that existed and were known to Golder when the Services were performed and this Report was prepared. Golder has not considered the effect of any possible future developments including physical changes to any relevant location or changes to any laws or regulations relevant to such location.

Where permitted by the Contract, Golder may have retained subconsultants affiliated with Golder to provide some or all of the Services. However, it is Golder which remains solely responsible for the Services and there is no legal recourse against any of Golder's affiliated companies or the employees, officers or directors of any of them.

By date, or revision, the Report supersedes any prior report or other document issued by Golder dealing with any matter that is addressed in the Report.

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