INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Transportation Summary Re-certification Audit Report

LYNX LOGISTICS
ABIDJAN COTE D'ÍVOIRE
7th – 11th July 2022

For

International Cyanide Management Institute

1400 I Street, NW, Suite 550
Washington, DC 20005, USA
Phone: 202-495-4020
Fax: 202-835-0155
E-mail: info@cyanidecode.org

Catalog

1.0 Introduction 3
2 Audit scope 3
3 Location detail and description of operation: 3
4 transit and Storage 5
5 Auditor's Finding 5
1. TRANSPORT: Transport cyanide in a manner that minimizes the 7
2. INTERIM STORAGE: Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures. 30
3. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities 32

1.0 Introduction

1.1 Company information

Name of Operation:	LYNX Logistics
Name of Operation Owner:	Marc Moukarzel
Name of Operation Operator:	LYNX Logistics
Name of Responsible Manager:	Eric Yoboue QHSE Director
Address:	Abidjan - Yopougon Zone industrielle 26 BP 1261 Abidjan 26 RCCM CI-ABJ-2016-B-28424 - CCN1709801N 26 BP 1261 Abidjan 26
Country:	Cote D'ivoire
Telephone:	+225-2723485928 or +225-0767809211
E-Mail:	m.moukarzel@lynx-ci.com

2 Audit scope

The audit scope is re certification for LYNX of cyanide road transport from Abidjan to mine site for solid sodium cyanide

3 Location detail and description of operation:

LYNX Logistics are contracted as a cyanide transporter for ORICA or any other supplier in Cote D'Ivoire, solid cyanide (briquettes) transported by road from Abidjan to Tongon mine .
LYNX cyanide operations is based in Abidjan, LYNX have a yard dedicated for cyanide.

The yard audited is the yard that receive and dispatch Cyanide, is located 18 kilometers from Abidjan main port Abidjan Yopougon Zone industrielle 26 BP 1261 Abidjan 26 RCCM CI-ABJ-2016-B-28424 -CCN1709801N

Cyanide is received at the port of Abidjan in 20ft sea containers, which each hold 20 boxes weighing 20 tons of solid briquette cyanide. The containers are offloaded at the ports by Stevedores and segregated from other containers.
A due diligence has been done on the port by ORICA as part of their supply chain of the cyanide producers and consignors.
For the purposes of Cyanide Code transportation compliance, LYNX responsibilities commence on collection of the containers from port and end at Mine site Gate.
Containers are delivered from the Quay to the stevedores where they are stacked and stored separately.
Control and monitoring of the containers is undertaken by stevedores who subscribe to the IMDG& IMO DG Code.
LYNX TRUCKS collect the containers with the documentation and manage them under a Transport Management Plan (jointly agreed between the supplier and the mine).
The containers are transported in escorted convoy to the mine sites.
Each truck has a driver, who is accompanied by an assistant.
Each convoy is made of 2 escort vehicles and 4 safety officers
Government formed an agency for the escort of all HAZMAT material
called SPECIAC escort team is made of 8 members

2-fireservicepersonnelchemicaldivision
2gendarmerie/MILITAIR
2 CIAPOL
2 SPECIAC

Mines and transporters are obliged to seek the escort of this agency ,
SPECIAC is mandated by the ministry of defence.
The safety officer ,driver or driver assistant manages communications between the trucks, the escort vehicles and the convoy manager, and monitors the driver.
The convoy consist of a convoy manager, assistant convoy manager, a cyanide first aid, safety officers, a mechanic, cyanide emergency response

equipment for spills and releases and medical equipment to treat cyanide exposures (splashes, skin exposures, inhalations and ingestion).
The convoys include 2fire service personnel chemical division
2gendarmerie/MILITAIR
2CIAPOL
2 SPECIAC.
LYNX have vehicles dedicated for he cyanide transport.
This operation has not experienced compliance problems during the previous three year audit cycle.

4 transit and Storage
The scope of the audit do not cover interim storage or storage
LYNX operation is to transport from port to mine site within west africa
LYNX trucks passes through the yard just to fuel and do final check before departure

5 Auditor's Finding

This operation is

X in full compliance
□in substantial compliance *(see below)
□not in compliance

with the International Cyanide Management Code.

This operation has not experienced compliance problems during the previous three year audit cycle.

Audit Company: Crown Transport & Logistics
Audit Team Leader: Ghassan Husseini
E-mail: ghass@ctllwa.com

Name and Signature of Lead & Technical Transport Auditor:

Name Ghassan Husseini Signature Date 25-7-2022

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, 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 Certification Auditors. I attest that this Summary Audit Report accurately describes the findings of the certification audit. I further attest that the certification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Cyanide Transportation Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

Date of audit: 7th -11th July 2022

Ghassan Husseini Lead Auditor Date 25-7-2022

1. TRANSPORT: Transport cyanide in a manner that minimizes the potential for accidents and releases.

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

X in full compliance

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

□not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

LYNX do route survey identifying possible route to destination.
based on the route survey they do route selection then they road risk assessment and journey plan
Road Survey is a set of directions providing details on when and how often to conduct a road survey and number of hazards,
Journey management is the most frequent updated and live document and is source to update the risk assessment as after every trip all new identified hazards are registered and inserted into the risk assessment. Journey plan indicates where authorized rests & stop points to be used along transport routes.
also departure time rest time, arrival, speed, barriers, road construction, cyclists, traffic congestion, standard caution, heavy rain, cattle crossing, children, bridge and other relevant trip planning issues.

The Road risk assessment procedure identifies steps to be taken in the assessment of transport routes and identifies personnel responsible for undertaking each step.
the risk assessment including the population density, bridges, water bodies, black points, road infrastructure slippery roads and black outs.
This incorporates detailed route and rest stops, SPECIAC/CIAPOL and gendarmerie points and needed controls.

The Convoy Manager is responsible for identifying and responding to unforeseen risks during transport and perform an update on the road hazard, changing risks.

Those updates are inserted into the road risk assessment.
LYNX OBC tracking trend are analyzed for every trip.
Due to the nature of the cargo, a permit is issued by the authority for the transport of cyanide.
These permits are given by the government.
LYNX Department of Transport has specified all approved routes to transport cyanide in ABIDJAN to serve various mines in Cote D'ivoire. SPECIAC/CIAPOL also escort the cargo due to the exemption enjoyed by the mines.
also Routes are selected and approved by the authority of the Ministry of Transport a permit is issued to that effect.
the RRA highlights black spots, warnings of hazards .
Every year the Survey team review the RRA and do a complete Road risk assessment for the roads that LYNX uses to transport cyanide every 5 years.
Road Survey which states the factors that need to be considered when doing the route risk assessment includes the symbols that should be used in the route risk assessment.
The process involves using maps and other data sources to identify likely routes considering population areas along a route, road condition, areas of potential difficulty or danger, proximity to hospitals and gendarmerie, communication reception, gradient, water, road works, river crossing infrastructure etc.
Once a potential route has been chosen. The survey team (made of transport and safety technical experts) undertakes a survey of the proposed route to assess additional potential issues and possible controls.
The survey team also meets and discusses issues or concerns with the client and drivers.
A risk assessment is then undertaken of the proposed route.
This includes implementing controls to reduce potential risks to a defined acceptable level before the route can be utilized.
If controls cannot be implemented to achieve the acceptable risk level, an alternative route will be found.
for consistency purposes of the Survey.
The outcome of the routes assessment process a list of the authorized transport routes is developed.
Each year the HSE Manager produces a list of authorized routes & roads that LYNX is able to use for cyanide transport and other Hazmat cargo.
The convoy manager is the custodian of these information.
The Road Survey procedure identifies steps to be taken in the assessment of transport routes and identifies personnel responsible for undertaking each step.

TMP considers the risks and the assessment of the risks as well insuring that the route has been analyzed in order to minimize the potential and impacts for accidents and releases, each delivery is undertaken via convoy.
LYNX have a list of authorized rest & stop points that can be used along transport routes approved by the authority.
The road risk assessment highlights areas of significant population density as well as concentrations of children(schools), pedestrian activity, cyclists and animals and the control measures needed to address the potential for accidents and releases or the potential impacts of accidents and releases including the road condition and the hazards associated with it that were picked up during escort.
the risk assessment describes the infrastructure , construction and the approved routes, the condition of the roads in terms of quality, drive-ability and safety that is also discussed by the pre-trip briefing.
It also address the road condition tarred or rough road, distance of the rough road and the recommended speed to be used , areas of potential difficulty or danger, proximity to hospitals and gendarmerie, communication reception, gradient, water, road works, river crossing infrastructure.
This reviewed every time there is a risk assessment and updated on the journey plan on each convoy.
ABIDJAN have 2 season raining and dry (Harmattan dry and dusty wind) during the dry season which reduces visibility.
LYNX evaluate risk and elaborate on measures on how to manage risks during transport routes.
LYNX also communicate all significant hazards with the client on road hazard or the changes on road.
Bearing in mind LYNX adhere to the strict regulations by the Ministries on road used for the cyanide transport.
The convoy is obliged to pass through a specific road defined by the Ministry and diversion is only allowed after the consent of the Ministry.
Risk are Identified, evaluated –Analyzed –Monitor, review, Communicate and consult.
LYNX requires risks to be reduced to a deemed acceptable level before the route can be utilized.
If the risk level is still high more controls are implemented to achieve the acceptable level.
prior of departure, LYNX communicate client and stakeholders per detailed in the Emergency Response Plan (ERP).

Any additional issues with the proposed route are addressed at this stage and it includes seeking consent from the mine on current river levels and road conditions.
LYNX ERP and Transport Management Plan (TMP) require that routes are reassessed in case of risks increasing reported during the road trips/survey or in case of changes.
During the convoy the Convoy Manager provides real time risk management on the route condition.
All Feedback on the route condition is documented at the End of Mission Report produced by the Convoy Manager following each voyage
These feedbacks are used as an awareness tool for convoy personnel and discussed during the pre-trip briefing in the next convoy.
The feedback is documented on road conditions, population, time of transit, where delay came from and possible solution to expedite the delivery.
The information from the feedback is collected, analyzed to reviewed and revise the level of risk on the road and if the risk or the number of hazards is increasing or reducing.
Route risk assessments are currently reviewed yearly.
All feedback is documented by Convoy Managers in the journey plan and transferred into the risk assessment during the yearly review.
Full road surveys are reviewed once a year although no alternative route is available
Convoy Managers have copies of the full route risk assessments, emergency response plan and emergency response plan annex contact list.
the Convoy Manager's one of his duties on the convoy is to alert, direct/inform the safety or driver assistant or driver on board of the trucks of all incoming hazards , including when to overtake, any on coming vehicles or if there is a barrier ahead.
The authority are responsible of the cargo security to destination.
gendarmerie, soldiers and SPECIAC/CIAPOL officers are aware of the dangers of cyanide and its implication.

Upon completion of the route risk assessment and acceptance of the route by the Client and Authorities.
and controls are also documented in the ERP for emergency situations.
the OBC tracking and convoy management system addresses the driver log and work hours and risks area
LYNX seeks input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures.
The survey team meet to discuss issues or concerns with the client and drivers.

On completion, copies of the Survey Report are sent to the mine site and external responders for comment and advice.
Prior to any voyage departure, the ERP contains a list of contacts including the client that positive communication must be checked with any additional issues with the proposed route can be addressed at this stage.

The Ministry for Health and the Public Health and High Command of the National gendarmerie have also been consulted by LYNX.
• The community is consulted and involved limiting their role to crowd control
LYNX have sent letters/flyer to all communities that falls within LYNX operation, explaining the dangers of cyanide, emphasizing the core responsibility of the community is not to get close during an incident and not to use any ground or surface water until it is declared safe to do so by the authority.
Furthermore, the Ministry in ABIDJAN are consulted on routes, especially considering the emergency response support issues.
LYNX uses convoys as a means of managing the risks of road transportation and responding to emergencies.
Each convoy consists of
2- 4x4 escort cars one leading and one at the end forming a closed convoy.
the Ivorian government formed an agency called SPECIAC and CIAPOL
This agency is in charge of all HAZMAT cargo escort within the Ivorian territory is made of 8 persons
2 fire service personnel chemical division
2 gendarmerie
2 SPECIAC
2 CIAPOL
It is obligatory for any transporter or end user to use this agency to escort the cargo this agency works under the ministry of defense.
the number of personnel is fix for a single truck or 5 .
The gendarmerie major role is to protect the products.
During transportation, drivers maintain a suitable gap between the vehicles in front whilst retaining visual contact.
Mobile phones, radios, horns and flashing of headlights are used to communicate between vehicles.
All containers are locked and sealed, and the trucks & containers are inspected prior to departure and at regular intervals throughout the convoy.
All cyanide deliveries are conducted using a convoy system with SPECIAC/CIAPOL escort, gendarmerie and other authorities.

Furthermore, the Emergency Response Team on the convoy has spill kits, first aid(antidot kit), a mechanic and safety officers. (Complete emergency response team).
LYNX does not contract nor subcontract any of its activities unless covered by due diligence as port operation.
LYNX does not manage the loading, unloading or DE stuffing of containers.
LYNX retain the full responsibility of the operation and the only function that is subcontracted is the port or stevedoring

Transport Practice 1.2: Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

X in full compliance with

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

☐not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
LYNX only uses trained and competent team to drive its trucks, escort vehicles and emergency response team.
All truck drivers have a permit E(HIGHEST PERMIT LEVEL) that allows the driver to drive trucks above the weight of 19 tons and hold at least a Middle School Leaving Certificate and they should be able to read and write.
Vehicle licenses are valid for three years and truck drivers are required to have a Category E(HIGHEST PERMIT LEVEL) license for vehicles that transports goods greater than 19 tons . which includes articulated trucks.
The Control and transport department check licenses before trip and the matrix that highlights the permits due to expire.
The Human Resources Assistant also keeps copies of original licenses using a matrix and provides a four and three month warning to drivers prior to the license expiry.
LYNX do implement cyanide awareness training, incorporating elements of dangerous goods training is provided by Orica / LYNX.
All the drivers are trained in defensive driving.
LYNX training control system uses a matrix that highlights every person required training and shows the attendees matrix of the annual training done. LYNX basic training are: firefighting, transportation of hazardous materials training, cyanide awareness transport training, and first aid training, defensive driving course.
The cyanide awareness training module is developed by a cyanide manufacture Orica.
The module contains information on product awareness and emergency response actions.
Prior to each convoy, a module of the cyanide awareness training is used as a refresher.

Tool box or during briefing held prior to departure to discuss issues and responses
Emergency simulations drill.
mock drill is planed once a year where specific aspects of the emergency plan are evaluated, is to assess the simulation drill.
Records of this training are kept for future reference.
Transport management plan which ensures that all drivers should be trained in defensive driving.
Scenario drill was performed in order to check the effectiveness of the escort team.
LYNX has the emergency response procedure that gives each person his role and responsibility
The containers which contain the cyanide boxes are sealed and loaded on LYNX trucks at the port by the stevedores.
They remain on the truck until unloaded at the mine by the mine staff.
any cyanide incidents that occur on the journey are handled by the accompanying convoy emergency team who are trained.
The convoy carries all the necessary cyanide emergency equipment (cyanide releases and medical) with them and they are under armed SPECIAC/CIAPOL escort.
LYNX does not contract nor subcontract any of its activities unless covered by due diligence as port operation.
LYNX does not manage the loading, unloading or DE stuffing of containers.
LYNX retain the full responsibility of the operation and the only function that is subcontracted is the port or stevedoring and this is covered by the due diligence.

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

X in full compliance with

The operation is □in substantial compliance with Transport **Practice 1.3**

□not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

LYNX only uses equipment designed and maintained to operate within the loads it will be handling when transporting cyanide.
The Company maintains a register of trucks and trailers and their design specifications used for the transport of cyanide.
the axle loads for trucks and trailers used is 10 tons conform with ECOWAS treaty signed 1992 and 2000 & UMOA TREATY SIGNED 1996 respectively and the ERP includes the calculation for determining whether the truck and trailer is appropriate for the load:
A Preventative Maintenance procedure implemented for all equipment, specifically for trucks used in the transportation of cyanide.
Prior to every convoy, equipment is checked using the Cyanide Equipment Checklist, these include inspections of the king pins and twist locks.
Maintenance personnel also travel with the convoy in the event of equipment failure.
Transport management plan that indicates LYNX uses only equipment designed to operate within the loads.
It is ensured that the axle loads are within the ECOWAS transport standards.
All the equipment used for cyanide transport have a preventative maintenance plan that is recorded.
The work conducted on the vehicles is based on the preventative maintenance schedule (time based or mileage base)
and a discussion between the mechanic and the vehicle driver (reactive maintenance).
At the completion of every journey the vehicles are sent to the workshop to do post trip maintenance.

LYNX maintains records of vehicle and trailer specifications and maintenance history.
LYNX transport only 2 x 20 Ft. container per truck
the truck consist of tractor head with 3 axels and 4 axel trailer for allowable gross weight of 70 tons based on 10 tons per axel as ECOWAS regulation state.
The weight of cyanide briquettes in a 20 foot container is 20 tons.
only 2 containers is carried on each trailer.
The weight of the container is 2.3 tons approved by port inspection
the weight of the trailer is 6 tons based on the trailer manufacturer specification.
The weight of the tractor or prime mover is 8.3 tons per truck manufacturer specification
Thus the total weight of the truck , trailer and load is 60 tons, including fuel.
The truck & trailer is a 7 axel unit for an allowable gross weight of 70 tons (3 axles on the tractor prime mover and 4 on the trailer), thus the weight on each axle is 8 tons per axle.
There is a planned maintenance program in place for the tractors, trailers done by agent.
Maintenance carried for the tractor head is by the agent (the vehicle manufacturer representative) and trailer are maintained by LYNX per maintenance plan on LYNX site.
The on-board computer on the truck dictates the maintenance needed, form and type of service required.

Cyanide is delivered as solid in bulker bags put into IBC box into a 20ft container.
No offload or loading is done.
The container weights are stated on the Bill of Lading that conforms to IMDG regulation.
Weights and equipment are checked to ensure that the transport equipment allocated is suitable for the task.
The cyanide is delivered in standard sea containers which are fitted on a skeleton trailer with twist locks.
It is not possible to overload the trailers because the containers are loaded by the producer with a set number of boxes with a set weight of 20 ton by the manufacturer.
The containers are sea worthy with inspection approval all containers comply with the IMDG
LYNX does not contract nor subcontract any of its activities unless covered by due diligence as port operation.

LYNX does not manage the loading, unloading or DE stuffing of containers.
LYNX retain the full responsibility of the operation and the only function that is subcontracted is the port or stevedoring and this is covered by the due diligence.

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

X in full compliance with

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

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

LYNX has procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging.
The TMP outlines that containers must be inspected prior to loading from port to ensure that all seals are intact and warning labels and registration numbers are in place.
Transport management plan indicates LYNX procedure to ensure the cyanide integrity never compromised.
Outlines the containers must be inspected before loading in order to ensure that proper labels and seals are in place.
Container is not opened for loading or offloading so it stays intact till it reaches the site.
The Bill of Lading is stamped by the Port Authority indicating the containers have been delivered undamaged with the same seals installed by the producers.
The container is also checked at the Mine, upon arrival at the mine site based on the delivery.
The ERP explains how the transport is done with packaging consisting of plastic lined wooden boxes packed into 20 foot containers and sealed.
The integrity of the boxes and containers can only be compromised if they are damaged during handling or if moisture/water/liquids enter the containers or the boxes in case of an accident on road.

The container is sealed by the producer and only opened at the mine.

due to the nature of the cargo and the danger associated with it, the cargo is escorted by gendarmerie, SPECIAC/CIAPOL, military and other authority to ensure the cargo integrity and packing is never changed and the containers is never opened till destination.
Furthermore, a Container Interchange Report is completed and jointly signed by the shipper's representatives and the cyanide transporter's representatives to agree on any damage that may be sighted on the container.

The Vehicle Trip Checklist is completed and signed at the mine confirming the condition, on delivery of the container and a section reports on container seals, labeling and general container condition.
This checklist is counter signed by the mine representative confirming no irregularities on container, seal and vehicle checklist inspections are carried out when the convoy stops during the day and overnight done by the safety officer.
Placards are used to identify cyanide shipment, as required by international standards.
The ERP and TMP outlines the requirement for placarding to be placed on the 4 sides of the sea containers used in the transport of cyanide.
As a control measure, the cyanide is trucked in convoy under the escort of persons who have received training in cyanide emergency response and dangerous goods training.
Cyanide to have the following markings:
• Number UNO: 1689
• Principal class: 6 Poison
• Group packing: 1
• Exact designation of the dispatched product: sodium cyanide, Solid.
The shipping container containing the IBC's is marked with Hazchem labels on all sides
Transport management plan indicates that placards are used to identify cyanide shipments.
the container check list identifies the placarding to be on all sides of the container during transport full to mine site and to be removed on the journey back after discharge.
The procedure refers specifically to placarding as per the IMDG Code requirements and ADR emergency response.
Prior to every convoy, vehicles and equipment are checked using the cyanide Equipment Checklist.
Completed checks form part of the convoy documentation.

A Preventative Maintenance procedure exists for equipment used in the transportation of cyanide.
Prior of every trip inspection is done.
At the completion of every journey the vehicles journey plan and the post trip inspection are sent to the workshop.
The work conducted on the vehicles is based on the preventative maintenance schedule (time and mileage based).
Work orders are raised for all work conducted for any issue the agent is contacted and the vehicle is sent there.
LYNX maintains records of vehicle and trailer maintenance history.
Once every vehicle returns, if any issues are found it is sent to the workshop or to the agent .
The work is based on driver input, as well as kilometer and hours.

Fleet Preventative Maintenance Procedures states that preventative maintenance is performed after every trip if the vehicle don't move then is done every 2 month on each vehicle indicating that the maintenance plan is trip ,mileage and time based any that comes first eliminating any vehicle skipping the maintenance net.
Preventative maintenance tasks are identified as broadly: - Inspection, preventative maintenance, oil changes and tune-ups.

It includes detailed maintenance requirements (preventative and breakdown maintenance) for tractors and for trailers though the tractor maintenance is managed by the Agent minor repair on road is done by LYNX
however for any major repair on road a replacement head (from the cyanide transportation truck) is sent to complete the task and the agent is contacted to send his engineers to repair the broken-down vehicle (the replacement process is captured in the operation risk assessment).
The trailer maintenance is done before and after every trip.

Limitations on operator hours are managed through the convoy planning stage.
The routes have been appropriately planned with set breaks and designated overnight stops.
Convoys can only move between 6:00 am and 06:00 pm after that time the convoy need to have a prior written permission and accompanying HSE measures in place.
the policy specifies the maximum available hours within any 24 hour period is (12 hours);
maximum driving hours in any 24 hour period is (9 hours);

driving hours from 6 am to 6 pm
maximum allowed for continuous driving 3 hours) with 30 minutes break;
minimum daily rest time 180 minutes per driving hours
availability is 12hrs /day
maximum weekly driving hours (48),
working week maximum of 6 consecutive days.
Also the convoy manager controls the driving and operating hours.
LYNX's procedures require twist locks to be engaged and checked for the transportation of cyanide containers.
At the Port, containers are secured using 8 twist locks.
The engagement of the twist locks is checked prior departure using the cyanide inspection checklist.

Transport management plan ensures load does not shift.
Trailers are equipped with twist locks that are engaged and checked when transporting cyanide.
4 Twist locks are used to secure 1 container.
Cyanide boxes come from the producers and the containers are not opened.
The box sizes are such that the boxes fit tightly in the container and do not move.
The container matches the trailer size.
Procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered.
In the event of demonstrations or accidents or natural hazards being encountered during transportation.
The Execution of Transport Procedure directs the convoy to stop and the Convoy manager to contact senior management as per TMP
Transport management plan requires the mine site to be contacted before the departure of the convoy.
Other security related issues are covered in detail in the ERP (copies carried by convoy leaders) which would be used by the convoy leaders, in consultation with LYNX management, to make appropriate decisions, depending upon circumstances in consultation with ABIDJAN Authorities.
LYNX has a HSE policy that commits to training staff HSE matters, misuse of drugs and alcohol and preventative actions relating to drug and alcohol.
The policy also notes that LYNX will carry out testing (random and for cause) for use of drugs and alcohol and in the event of a positive test will result in actions including further preventative training.
the policy ensures that drugs and alcohol are controlled.

There is a briefing before every trip on the use of alcohol and drugs and this is also a part of the risk assessment of the pre-trip inspection clearly stating alcohol and drugs are prohibited (includes a section on Drug and alcohol policy).
before every trip an alcohol test is carried out also during the trip every morning an alcohol test is carried out using a breath analyzer.
Policy includes use of drugs and alcohol on the company premises or whilst driving and the consequences of positive test results.
The driver also signs that he accepts the results in case there is a test for alcohol or a drug test.

Retention of records documenting that the above activities have been conducted.
Records are maintained for the past three years and were inspected for relevant parts of this element as indicated adjacent to each finding.
If the reading is positive, it is sent to the hospital to confirm the reading.
LYNX has ISO 9001 Certificate, keeping records is mandatory for all the activities.
LYNX does not contract nor subcontract any of its activities unless covered by due diligence as port operation.
LYNX does not manage the loading, unloading or DE stuffing of containers.
LYNX retain the full responsibility of the operation and the only function that is subcontracted is the port or stevedoring and this is covered by the due diligence.

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

X in full compliance with

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

□not in compliance with

X Not applicable

Summarize the basis for this Finding/Deficiencies Identified:

LYNX are not responsible nor contracted to manage cyanide consignments by sea the scope of this audit is only land transport from port to destination..
LYNX does not manage the loading, unloading or DE stuffing of containers or stevedoring .
however this requirement is covered by the due diligence done by
diligence done by ICMI AUDITOR.
and it is visible on the container on all the 4 sides the following
1- 1689 placard
2-marine pollutant placard
3-class 6 toxic placard
LYNX ensure that upon collection of container from port has the needed placarding for land transport

Placards are used to identify cyanide shipment, as required by international standards IMDG and IMO DG code requirement.
the responsibility of placarding falls on the supplier or the manufacturer LYNX are not responsible for placarding since they do not open or swap containers
however LYNX has a stock of placard they keep in case one of the placard is damage during sea transport supplied by Orica.

The ERP and TMP outlines the requirement for IBC containers used in the transport of cyanide to be placard on the four sides.
As a control measure, the cyanide is trucked in convoy under the escort of persons

who have received training in cyanide emergency response and dangerous goods training.
Cyanide to have the following markings:
• Number UNO: 1689
• Principal class: 6 Poison
• Group packing: 1
• Exact designation of the dispatched product: cyanide of sodium, Solid
The shipping container containing the IBC's is marked with Hazchem labels on all
Transport management plan indicates that placards are used to identify cyanide shipments.
the container check list identifies the placarding to be on all sides of the container during transport full to mine site and to be removed on the journey back after discharge.
The procedure refers specifically to placarding as per the IMDG Code requirements and ADR emergency response.

the operation has been carried out in accordance with the following conditions:
.1 The container was clean, dry and apparently fit to receive the goods;
.2 Packages, which need to be segregated in accordance with applicable segregation requirements, have not been
packed together onto or in the container/vehicle [unless approved by the competent authority concerned in
accordance with 7.3.4.1 (of the IMDG Code)];
.3 All packages have been externally inspected for damage, and only sound packages have been loaded;
.4 Drums have been stowed in an upright position, unless otherwise authorized by the competent authority, and all
goods have been properly loaded, and, where necessary, adequately braced with securing material to suit the
mode(s) of transport for the intended journey;
.5 Goods loaded in bulk have been evenly distributed within the container/vehicle;
.6 For consignments including goods of class 1, other than division 1.4, the container/vehicle is structurally serviceable
in accordance with 7.1.2 (of the IMDG Code);
.7 The container/vehicle and packages are properly marked, labelled, and placarded, as appropriate;
.8 When substances presenting a risk of asphyxiation are used for cooling or conditioning purposes (such as dry ice

(UN 1845) or nitrogen, refrigerated liquid (UN 1977) or argon, refrigerated liquid (UN 1951)), the container/vehicle
is externally marked in accordance with 5.5.3.6 (of the IMDG Code); and
.9 A dangerous goods transport document, as indicated in 5.4.1 (of the IMDG Code) has been received for each
dangerous goods consignment loaded in the container/vehicle.
NOTE: The container/vehicle packing certificate is not required for portable tanks
5.4.2.2 The information required in the dangerous goods transport document and the container/vehicle packing
certificate may be incorporated into a single document; if not, these documents shall be attached one to the other. If the
information is incorporated into a single document, the document shall include a signed declaration such as “It is declared
that the packing of the goods into the container/vehicle has been carried out in accordance with the applicable provisions”.
This declaration shall be dated and the person signing this declaration shall be identified on the document. Facsimile
signatures are acceptable where applicable laws and regulations recognize the legal validity of facsimile signatures.
5.4.2.3 If the container/vehicle packing certificate is presented to the carrier by means of EDP or EDI transmission
techniques, the signature(s) may be electronic signature(s) or may be replaced by the name(s) (in capitals) of the person
authorized to sign.
5.4.2.4 When the container/vehicle packing certificate is given to a carrier by EDP or EDI techniques and subsequently
the dangerous goods are transferred to a carrier that requires a paper container/vehicle packing certificate, the carrier shall
ensure that the paper document indicates "Original received electronically" and the name of the signatory shall be shown in
capital letters.
Shipping records indicating the amount of cyanide in transit and Material Safety Data Sheets (MSDS) are available during transport.
The delivery documentation notes the container numbers, weights and seal numbers.
The ERP and TMP are also carried on the convoy along with an MSDS for cyanide and a list of emergency contacts between the port and site.

LYNX implement chain of custody processes to prevent loss of cyanide during shipment.
The Bill of Lading is stamped by the Port Authority indicating the containers have been delivered undamaged with the seals intact.
The container weights are also detailed on the Bill of Lading.
The declared weight of the container is appearing on the delivery note.
The container seals are checked by the Mine upon arrival at the mine site to confirm.
LYNX manages the supply custody using the TMP The cyanide from the port of entry to destination is under the control and the responsibility of the authority due to the dangerous nature of the cargo.
A copy of the documents are also kept with the convoy manager during transit and the escorting by authority

Communication blackout areas are identified during the route assessment process
Where no reception exists, the Convoy Leader calls the LYNX Depot before and after the reception black spot as detailed in the TMP.
All prime movers and escort vehicles are equipped with tracking which is monitored at the LYNX depot.
Road survey report Abidjan Tongon(sissigue) Road Survey (account of the road survey report)
LYNX track the progress of cyanide shipments through the use of the tracking system fitted to prime movers and escort vehicles.
Transport management plan indicates that cyanide shipments are tracked through using tracking system.
GPS tracking is implemented for all convoys .
Convoy Manager phone LYNX head office every 60 minutes and LYNX head office update the mine every 2 hours.

LYNX implement chain of custody processes to prevent loss of cyanide during shipment.
The Bill of Lading is stamped by the Port Authority indicating the containers have been delivered undamaged with the seals intact.
The container weights are also detailed on the Bill of Lading.
A scanner is used at the Port to verify that the correct container has been placed on the selected trailer.
The container seals are checked by the mine upon arrival at the mine site to confirm.

LYNX uses convoys as a means of managing the risks of road transportation, responding to emergencies and to prevent product loss.
The cyanide from the port of entry to destination is under the control and the responsibility of the authority due to the dangerous nature of the cargo.
LYNX transports and delivers cyanide sealed containers

shipping records BL indicating the amount of cyanide in transit and Material Safety Data Sheets (MSDS) are available during transport.
The delivery documentation notes the container numbers, weights and seal numbers.
The ERP and TMP are also carried on the convoy along with an MSDS for cyanide and a list of emergency contacts between the port and site.
LYNX implement chain of custody processes to prevent loss of cyanide during shipment.
The cyanide from the port of entry to destination is under the control and the responsibility of the authority(SPECIAC /CIAPOL) due to the dangerous nature of the cargo.

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

X in full compliance with

The operation is ☐in substantial compliance **with Transport Practice 1.6**

☐not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

LYNX uses cell phone to communicate directly with the LYNX office and emergency responders.
Vehicles are equipped with GPS tracking monitored by LYNX.
VHF BAOFENG radio used to communicate within the convoy and head office.
LYNX has a mobile phone that goes on every convoy.
Communication with vehicles in the cyanide convoy is undertaken using mobile phones, and short-wave radio.
Vehicle tracking system (EASYTRACK)
The safety or driver or the driver assistant can use the communications equipment in each truck to communicates with the convoy leader and support vehicles.
The convoy manager has the mobile phone or cell phone to communicate with LYNX head office.
Convoy managers have all the appropriate telephone numbers to communicate with LYNX head office and appropriate emergency responders and emergency services during trip all these contacts are in the ER plan.
The convoy manager is obliged to call LYNX every 60 minutes and is reported to the client by LYNX head office.
The LYNX head office manages all associated communications with the mine , authority, the cyanide producer and ICMI .

Where no reception exists, the convoy manager calls before and after the reception black spot.
The ERP and the RRA contains a map showing areas without telephone reception.
Also, the GPRS tracking send alert if the trucks is parked idling for 3 minutes.
All prime movers and escort vehicles are equipped with tracking which is monitored at LYNX head office.

VHF BAOFENG radio, headlights and horns are used to communicate incidents between vehicles in the same convoy.
The closed convoy allows trucks experiencing troubles to communicate with at least one escort vehicle and this vehicle communicates with the other.
In the event of a problem with one truck, the entire convoy stops.
The TMP indicates that communication equipment shall be tested, reviewed and confirmed before convoy departure.
Also, they are used regularly and tested during the simulation or mock drill that is done 1 time in a year.
Communication equipment (GPS, mobile phone, radio,) is periodically tested to ensure it functions properly.
The GPS tracking system is checked, though is in continuous use.
Communication blackout areas are identified during the route assessment process
The Road survey report Abidjan –Tongon(sissigue).
LYNX implement chain of custody processes to prevent loss of cyanide during shipment.
The Bill of Lading is stamped by the Port Authority indicating the containers have been delivered undamaged with the seals intact.
The container weights are also detailed on the Bill of Lading.
A scanner is used at the Port to verify that the correct container has been placed on the selected trailer.
The container seals are checked by the mine upon arrival at the mine site to confirm.

LYNX uses convoys as a means of managing the risks of road transportation, responding to emergencies and to prevent product loss.
The cyanide from the port of entry to destination is under the control and the responsibility of the authority due to the dangerous nature of the cargo.
LYNX transports and delivers cyanide sealed containers
Shipping records kept for the past three years indicating the amount of cyanide in transit and Material Safety Data Sheets (MSDS) are available during transport.
The delivery documentation notes the container numbers, weights and seal numbers.
The ERP and TMP are also carried on the convoy along with an MSDS for cyanide and a list of emergency contacts between the port and site.
LYNX implement chain of custody processes to prevent loss of cyanide during shipment.

The Bill of Lading is stamped by the Port Authority indicating the containers have been delivered undamaged with the seals intact.
The declared weight of the container is appearing on the BL and delivery note.
The container seals are checked by the Mine upon arrival at the mine site to confirm.
The cyanide from the port of entry to destination is under the control and the responsibility of the authority due to the dangerous nature of the cargo.
A copy of the documents are also kept with the convoy manager during transit and the escorting by authority
LYNX does not contract nor subcontract any of its activities unless covered by due diligence as port operation.
LYNX does not manage the loading, unloading or DE stuffing of containers.
LYNX retain the full responsibility of the operation and the only function that is subcontracted is the port or stevedoring and this is covered by the due diligence done by ICMI AUDITOR.

2. INTERIM STORAGE: Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.

Transport Practice 2.1: Store cyanide in a manner that minimizes the potential for accidental releases.

X in full compliance with

The operation is ☐in substantial compliance **with Transport Practice 2.1**

☐not in compliance with

X Not applicable

Summarize the basis for this Finding/Deficiencies Identified:

Within the scope of this audit, there are no trans-shipping depots or Interim storage sites, as defined in the audit protocol.
Following collection from the Port, the containers are sent to client site.
At no stage is cyanide removed from the trucks or containers prior to unloading at mine sites and since the cargo is under the custody of the authority SPECIAC/CIAPOL), the authority doesn't allow the cargo to park or be sent anywhere apart from the approved route.
LYNX does not manage the loading, unloading or DE stuffing of containers or stevedoring .
placarding is visible on the container on all the 4 sides the following
1- 1689 placard
2-marine pollutant placard
3-class 6 toxic placard
4- last convoy vehicle has banner indicating dangerous goods
LYNX has a procedure that prohibits eating or drinking near the cyanide and needed PPE
The Shipping records indicating the amount of cyanide in transit and Material Safety Data Sheets (MSDS) are available during transport.

The delivery documentation notes the container numbers, weights and seal numbers.
The ERP and TMP are also carried on the convoy along with an MSDS for cyanide and a list of emergency contacts between the port and site.
LYNX implement chain of custody processes to prevent loss of cyanide during shipment.
the Ivorian government formed an agency called SPECIAC and CIAPOL
This agency is in charge of all HAZMAT cargo escort within the Ivorian territory is made of 8 persons
2 fire service personnel chemical division
2 gendarmerie
2 CIAPOL
2 SPCIAC

It is obligatory for any transporter or end user to use this agency to escort the cargo this agency works under the ministry of defense .the number of personnel is fix for a single truck or 5.

3. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities

Transport Practice 3.1: Prepare detailed emergency response plans for potential cyanide releases.

X in full compliance with

The operation is □in substantial compliance **with Transport Practice 3.1**

□not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

LYNX developed and ER plan that covers :
1. Introduction
2. Scope
3. Road Transport Emergency Response System Flowchart
4. Emergency Organization Members & Contact Numbers
5. Organization and Communication
(a) Communication
(b) Emergency Control Center
(c) Key Responsibilities
(i) Base Controllers
(ii) Press Focal Point
(iii) Incident Controllers
6. General Procedures & Likely Scenarios
(a) Truck Breakdown
(b) Truck Accident – No Spill
(c) Truck Accident – Spill
(d) Truck Accident with Fire
(e) Truck Driver Injury
(f) Security Risk- Armed Robbery
(g) Truck Accident Communication
7. Emergency Exercise & Training Best Practice
Annex A Serious Vehicle Accident Form

Annex B Items required For Emergency Response
Each convoy carries along the ER plan that contain a copy of the MSDS the road risk assessment the TMP the MSDS for cyanide and a list of emergency contacts between the port and site.
the ER plan emphasizes on what to do during cyanide accident from first aid to neutralization to external responders.
This plan gets updated yearly or when the ER plan is activated or in case of a drill feedback that needs to amended.
on each convoy, the accompanying Emergency Response Team will implement the Emergency Response Plan.
If more support is needed in which case they will report to head office or external responders
include reporting to Suppliers, Mine and ICMI for any significant incident

The ERP is appropriate for the selected transport route.
LYNX manages the risks on road by protection, prevention and intervention before and during transport.
LYNX control convoy using the convoy formation and reduced speeds (max 60 km / h)
The ERP details instructions in the event of emergency situations:
addresses the roles and responsibility of the convoy personnel during the below scenarios
• Accident without sodium cyanide discharge
• Accident with sodium cyanide discharge
• Accident with sodium cyanide discharge in water
• Fire ERP also lists the following abnormal operations that have been identified as potential risks along the transport route:
• The temporary closing of a road due to floods on the road
• The temporary closing of the road due to civil disorders
In the event of abnormal operations, personnel are instructed to contact senior management before proceeding.
As all cyanide deliveries are made in closed convoy, the accompanying Emergency Response Team will implement the Emergency Response Plan.
If more support is needed in which case they will report to head office or external responders

Physical and chemical forms of cyanide are described ln the ERP and TMP.
ERP contains response information for identified likely emergency scenarios.

The emergency response instructions developed are relevant to solid cyanide and its packaging in IBCs within 20 foot sea containers.
LYNX only transport solid cyanide. The ERP has detailed the steps to be taken to neutralize and clean up residual cyanide in the event of a spill.
Collection of contaminated soil or spilled product will be sent to mine for disposal, use or neutralization
Plan only deals with solid cyanide (cyanide briquettes), and if they are spilled into water and in case there is an accident with ACID truck.
However, currently the only form of cyanide that is transported is solid in a sealed sea containers.
The TMP and ERP consider the method of transport.
The documents are based on road transportation between the Port and Tongon(sissigue)-Karta Mine in Northern ABIDJAN.
The documents were developed as an outcome of the route assessment process and consequently consider risks of the transport infrastructure and the method of transport.
LYNX only undertakes road transport and all risk assessments cover road transport.
Route risk assessments are fully reviewed every year and redone every 5 years.
But feedback is done on every trip.
The TMP and ERP consider the design of the transport vehicles as it is specifically drafted around the transport of solid cyanide in shipping containers on semi-trailers.
the vehicles load capacity and ability is much higher than required.
The emergency situations described in the ERP are based on prime mover and trailer configurations with 20 foot containers.
Transport management plan, considers the design of the transport vehicles which it was specifically made for transporting the 20ft containers.
LYNX only uses skeleton and Flatbed trailers to transport containers containing boxes of cyanide briquettes in sea worthy container.
They do not use ISO tanks and transport only solid briquette.
there is no Interim storage reference to principle 2
The ERP includes descriptions of response actions, as appropriate for the anticipated emergency situation.
Escort Leader
Escort Vehicle 1 Driver
HSE Officer
gendarmerie
Driver
Assistants Drivers

Escort Vehicle 2 Driver
A flow diagram is included in the ERP that outlines
The flow of information in the event of a cyanide incident during transport.
general likely Scenario
Accident road -Thunder fire-Road accident with dangerous material-Health of staff during driving
Robbery and attack or social unrest, stealing, and strikes.
Products spill –Fire-Explosion-Floods
In case of cyanide accident SPECIAC and CIAPOL are on the convoy
roles and responsibility and the communication flow are in the ERP including reporting to suppliers, end user , local authority and ICMI
permit issued to LYNX from authority to transport HAZARDOUS goods.
The mine site primarily provides logistical support in the event of an emergency (crane, security etc.) in case the incident is within vicinity or close by.
The roles of the gendarmerie, Fire Brigade and Hospitals are in accordance with their duties.
As noted in 1.1.7 external responders were advised of their roles during an emergency response through letters and training coordinated by LYNX and mock drills that they participated.
gendarmerie undergo training and mock drill before participating in convoys.
In the event of an emergency, military gendarmerie are responsible for security of product and the gendarmerie for crowd control functions which is not outside the scope of their normal roles also because the gendarmerie are trained on cyanide by LYNX.
External agencies SPECIAC are also involved with incident scenario training simulations or mock drill at least once per year.
The communities have not been allocated a major role during an emergency only crowd control and disseminate information not to use water until approved by authority, however the communities are informed with all details.
The majority of scenarios will be responded to by the convoy's own dedicated emergency response team.
Any outside additional assistance would be requested or coordinated through LYNX head office and the Ministry of Security
The possibility of using outside medical responders has been considered and a communication through letters and brochures
LYNX management inform ICMI of the following incidents
a) any Human exposure ;
b) any cyanide release or loss of containment or loss of control;

c) any wildlife fatalities by cyanide
d) Theft of cyanide.

the Ivorian government formed an agency called SPECIAC
This agency is in charge of all HAZMAT cargo escort within the Ivorian territory is made of 8 persons
2 fire service personnel chemical division
2 gendarmerie
2 CIAPOL
2 from SPCIAC

It is obligatory for any transporter or end user to use this agency to escort the cargo this agency works under the ministry of defense and the charges are paid to the agency for every escort
the number of personnel is fix for a single truck or 5.

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

X in full compliance with

The operation is ☐in substantial compliance **with Transport Practice 3.2**

☐not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

LYNX provides emergency response training for all staff
LYNX has developed a training matrix for transport personnel.
This matrix identifies the minimum training requirements for escort personnel and convoy drivers:
First aid
Training on cyanide awareness
Site induction
Chemical response
Responding to accidents to incidents
Crowd control
Defensive driving
Additional training is provided to personnel involved in responding to an emergency:
• Initial response and oxygen administration
• PPE
• Sodium cyanide safety
• Emergency response
• MSDS
• Emergency fire and evacuation brochure
• Roles and responsibilities

Emergency training simulation involving external responders is conducted once per year where specific aspects of the emergency plan are evaluated.
Records of this training are kept for the past three years for future reference.
Transport management plan states that involvement and training of stakeholders in case of emergency.

Personnel are trained by Orica training module and using their presentation.
Convoy team members are trained in emergency response.

There are descriptions of the roles and responsibilities in the ERP.
the ERP contains four critical emergency response guides to be followed in the event applicable in case of an incident involving cyanide:
• Accident without sodium cyanide discharge
• Accident with sodium cyanide discharge
• Accident with sodium cyanide discharge in water
• Fire

Other scenarios'
Accident road -Robbery - social unrest, strikes.
Products spill –-Floods

The ERP details the specific actions to be taken by LYNX members in the event of an emergency:
• Escort Leader
• Escort Vehicle Driver
• HSE Officer
gendarmerie
Driver
Reserve Drivers
Assistant Drivers
Escort Vehicle 2 Driver
A flow diagram is included in the ERP that outlines the flow of information in the event of a cyanide incident during transport.
The ERP also outlines key commitments of the cyanide manufacturer.
LYNX personnel are trained on roles and responsibility in relation to what their role is during a spill incident and what PPE they should use and if there is an overlapping roles.

LYNX has a checklist for emergency equipment that is available during transport or along the transportation route.
Equipment lists are provided in the Appendix 3 of the ERP.
Checklists include the presence of equipment required and also check the state (good/ bad) of equipment.

Transport management plan escort vehicles must be equipped with the appropriate equipment and thoroughly checked before the start of the convoy.
LYNX retains an inventory of emergency equipment available in the main yard in case of need to mobilize for an incident and the equipment needed per convoy.
The equipment is checked per trip and monthly expiry and test are done per inspection.
LYNX has a checklist for necessary emergency response equipment also health and safety equipment include PPE that is checked before each convoy.
Checklists include the presence of equipment required also check the state equipment condition or status (good bad).
Copies of these completed forms were filed and copy goes with the convoy manager, these filled forms are also kept as records.
The Convoy escort vehicles carry all the necessary emergency response equipment that may be required for cyanide emergencies during the convoy routing.
LYNX has procedures to inspect emergency response equipment and assure its availability when required.
The ERP outlines the requirement to check emergency response equipment prior to each convoy departure.
The convoy cannot leave unless all equipment is available and in appropriate condition.
A cyanokit antidote kit is kept on the convoy though it is to be administered by the closest trained hospital.
The HCN detector is also tested and sent to the manufacturer when due for calibration every 12 months(dragger)
when it's not possible to send for calibration new HCN detector is bought
LYNX do not contracts nor subcontract other entities to conduct any of the activities required in Transport Practice 3.2 or has designated other entities to conduct emergency response activities,
however external responders roles and responsibilities are defined in 3.1
LYNX does not contract nor subcontract any of its activities unless covered by due diligence
LYNX retain the full responsibility of the operation and the only function that is subcontracted is the port or stevedoring and this is covered by the due diligence done by ICMI AUDITOR
the Ivorian government formed an agency called SPECIAC and CIAPOL
This agency is in charge of all HAZMAT cargo escort within the Ivorian territory is made of 8 persons
2 fire service personnel chemical division

2 gendarmerie
2 CIAPOL
2 from SPCIAC

It is obligatory for any transporter or end user to use this agency to escort the cargo this agency works under the ministry of defense and the charges are paid to the agency for every escort
the number of personnel is fix for a single truck or 5 .

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

X in full compliance with

The operation is □in substantial compliance **with Transport Practice 3.3**

□not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The ERP has the contacts list that are relevant during an emergency with their appropriate work position.
The ERP and associated documents contain procedures and current contact information for notifying the shipper, client/ receiver/consignee, outside responder, providers, medical facilities and ICMI ,generally stakeholders during an emergency.

The ERP includes a contact list of all the staff, companies that must be contacted before each voyage is undertaken.
This includes supplier, shipping line, Stevedores, clearing agent, government agencies, client and LYNX representatives.
A flow diagram is included in the ERP that outlines the conveying of information in the event of a cyanide incident during transport.
In the event of an emergency incident, it is the escort leader who contacts LYNX and LYNX contacts the required people outlined in the flow diagram.
LYNX ERP procedure section 3 demand LYNX management inform ICMI of the following incidents
a) Human exposure that requires an action by an emergency response team, such as decontamination or treatment. ;
b) release which enters natural surface waters, ;
e) A transport incident requiring emergency response for cyanide release;
f) Events of multiple wildlife fatalities where cyanide is known or believed to be the cause of death
g) Theft of cyanide.

LYNX has systems in place to ensure that internal and external emergency notification and reporting procedures are kept current.
The ERP requires a review of the Contacts List prior to the convoy departure. nevertheless the ER plan is reviewed every year which include the contact list also when the ER plan is activated , this to ensures that the list is kept up to date.
The Transport Preparation procedure designates it the responsibility of the Health Safety Security and Environment Officer / Convoy Leader to ensure that contact numbers are checked and validated prior to departure.
Updated annually when all procedures are due for update.
By using the drill, it would assess the effectiveness of the ER plan
LYNX has systems in place to ensure that internal and external emergency notification and reporting procedures are kept current.
Though there were no significant cyanide incidents during the past 3 years.

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

X in full compliance with

The operation is ☐in substantial compliance **with Transport Practice 3.4**

☐not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
The ERP and the TMP gives detail process on how to deal with the spill
contain procedures for remediation such as recovery or neutralization of solutions or solids, decontamination of soils
or other contaminated media and management and/or disposal of spill clean-up debris.
In the event of a spill, all cleaning will be carried out by LYNX. Personnel are first required to contain the spill
or discharge as soon as possible to avoid greater contamination of the site.
Residual cyanide will be recovered and neutralized according to the procedures for neutralization which were established by the manufacturer.
Recovery and treatment of Spills; Recovery of Solids; Neutralization or removal of soils;
Treatment and or disposal of soils; reclamation of Sodium Cyanide; Transport of contaminated materials;
Neutralization; and Water Resource Treatment.
Not to use chemicals in water bodies.
All debris and waste are sent to the mine for disposal since it contains cyanide.
Both the ERP and TMP clearly prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate or hydrogen peroxide for the treatment of cyanide discharged to surface moving or underground water.
The ERP details the negative implications of using sodium hypochlorite, ferrous sulfate or hydrogen peroxide for the treatment of cyanide discharged to surface moving water.
the Ivorian government formed an agency called SPECIAC and CIAPOL
This agency is in charge of all HAZMAT cargo escort within the Ivorian territory
is made of 8 persons

2 fire service personnel chemical division
2 gendarmerie
2 CIAPOL
2 from SPCIAC

It is obligatory for any transporter or end user to use this agency to escort the cargo this agency works under the ministry of defense .the number of personnel is fix for a single truck or 5.

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

X in full compliance with

The operation is ☐in substantial compliance **with Transport Practice 3.5**

☐not in compliance with

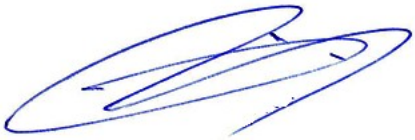
Summarize the basis for this Finding/Deficiencies Identified:

LYNX reviews all procedures include ER plan every year.
Also the management reviews were all recorded.
Incidents are reviewed especially emergency situation .
The internal audit evaluates the effectiveness of the system.
LYNX has provisions for periodically reviewing and evaluating the adequacy of its plans.
LYNX has systems in place to ensure that internal and external emergency notification and reporting procedures are kept current
The ERP requires a review of the Contacts List prior to the convoy departure.
This ensures that the list is kept up to date.
The ERP has had yearly revision since its development.
Yearly review of the road risk assessment are identified and review of the procedures are updated yearly.
generally the ER plan is reviewed on the following basis
1-yearly
2-after an incident
3 after a drill .

LYNX conducts at least 1 mock drill per year, addressing cyanide release and exposure cyanide 's mock drill is a as part of the cyanide awareness training.
Drills could be done with client or external responders.
As discussed in Section 3.2.1, emergency simulations are carried out 1 per year where specific aspects of the emergency plan are evaluated.
A training simulation involving external responders is conducted at least once per year.

the drill done by LYNX in order to have the escort team to react effectively and professionally in the case of a cyanide incident in workshop.
Evaluation of the Mock drill was done by all observant and the leering point affect the ER plan as well as other procedures including the TMP, equipment used and training which can lead to amendments made accordingly.
No cyanide incidents have been reported to date.
In addition the ERP contains the requirement that it is to be reviewed and implemented.
LYNX has systems in place to ensure that internal and external emergency notification and reporting procedures are kept current.
The ERP requires a review of the contacts list prior to the convoy departure.
This ensures that the list is kept up to date.

This summary report was prepared by:



Ghassan Husseini
Lead & transport Expert Auditor