REPORT

TO-PET - Turkey

ICMI CERTIFICATION SUMMARY REPORT

Submitted to:

International Cyanide Management Institute (ICMI)
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Washington, DC 20005
UNITED STATES OF AMERICA

Submitted by:

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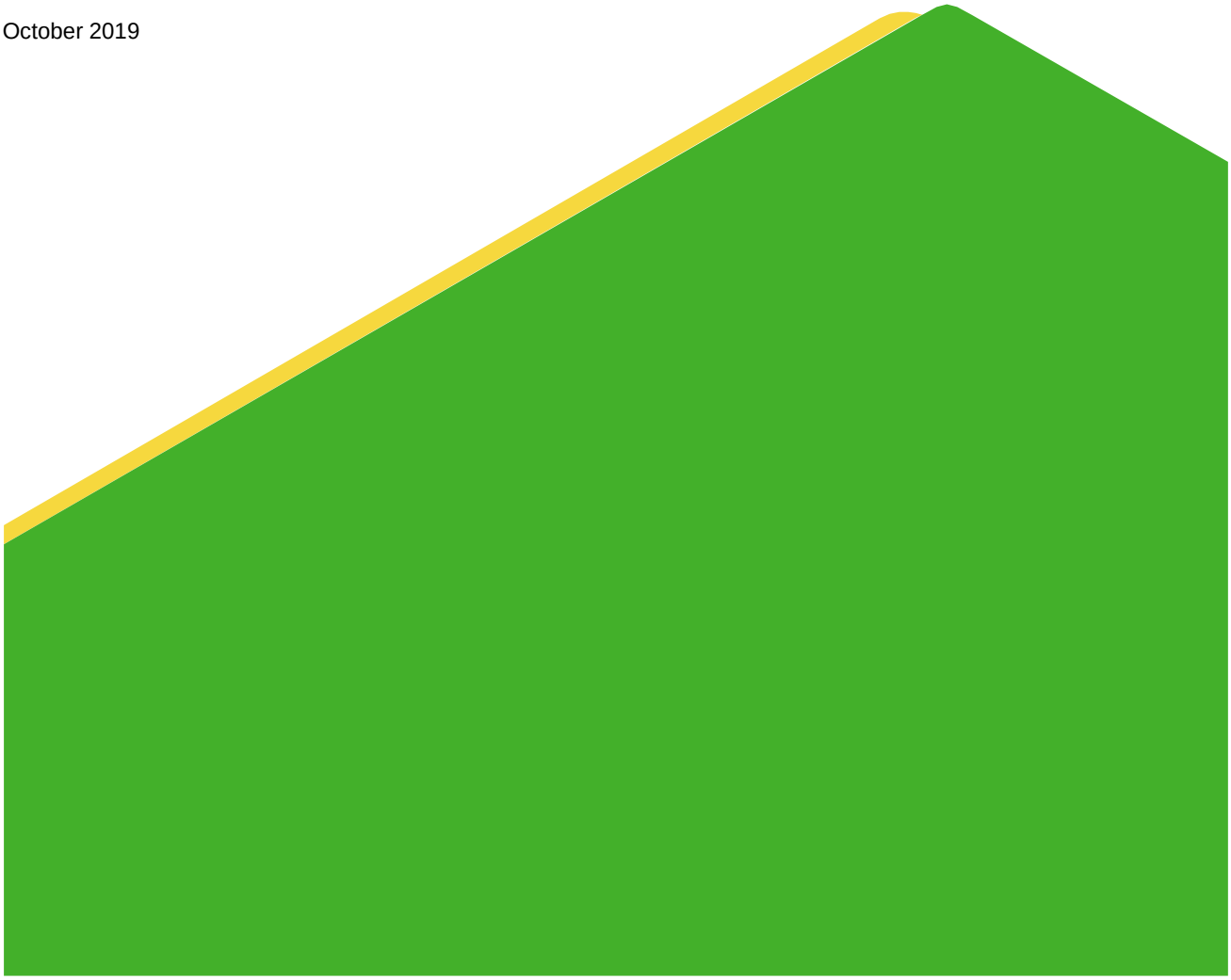
October 2019



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ICMI - 1 copy (pdf)

To-Pet - 1 copy (pdf)

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Table of Contents

1.0 SUMMARY AUDIT REPORT FOR CYANIDE TRANSPORTATION OPERATIONS

Name of Cyanide Transportation Facility: To-Pet - Turkey

Name of Facility Owner: To-Pet - Turkey

Name of Facility Operator: To-Pet - Turkey

Name of Responsible Manager: Muharrem Altinay

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2.0 TO-PET OVERVIEW

This report focuses on transport of Cyanide from the relevant port in Turkey to mine sites within Turkey. At the time of the audit, To-Pet had 12 planned routes with starting points at 4 ports. The routes are summarised below:

- The Port of Izmir to the Tüprag Kişladağ Uşak Gold Mine, Turkey.
- The Port of Izmir to the Koza Eskişehir Kaymaz Gold Mine, Turkey.
- The Port of Izmir to the Koza Bergama Ovacik Gold Mine, Turkey.
- The Port of Izmir to the Tümad Balikesir Ivrindi Gold Mine, Turkey.
- The Port of Izmir to the Tümad Canakkale Lapseki Gold Mine, Turkey.
- The Port of Pendik to the Tüprag Kişladağ Uşak Gold Mine, Turkey.
- The Port of Mersin to the Anagold Erzincan Iliç Gold Mine, Turkey.
- The Port of Mersin to the Demirexport Sivas Gold Mine, Turkey.
- The Port of Mersin to the Koza Kayseri Himmetdede Gold Mine, Turkey.
- The Port of Mersin to the Oksüt Kayseri Develi Gold Mine, Turkey (note currently mine under construction).
- The Port of Trabzon to the Anagold Erzincan Iliç Gold Mine, Turkey.
- The Port of Trabzon to the Koza Gümüşhane Mastra Gold Mine, Turkey.

For these, transport routes have been planned, appropriate systems developed and applied, and in some cases transportation convoys have been undertaken under separate contracts.

To-Pet may also consider additional ports, routes and mine sites within Turkey in the future. If these are used, they will develop appropriate systems in advance of the convoys taking place.

The following two parties are involved in all To-Pet routes:

1) To-Pet, Izmir, Turkey

Transport company To-Pet operates the transport vehicles taking cyanide containers between the relevant Port and the gold mine (and in future to other mine sites in Turkey). It is noted that To-Pet is the company that took over the previous transporter (Anhan Nakliyat) in 2015 and the personnel involved are largely the same. The procedures have also been developed from the former Anhan Nakliyat procedures.

2) Meke-Hydra; Istanbul, Turkey

Meke-Hydra (Hydra) is a service supply organization providing, among others, services for marine pollutant protection (preventive and reactive) and risk preventing services / operations, including emergency response and escort service. Hydra is contracted by To-Pet to run and update the Emergency Response Plan for To-Pet. Hydra also provides training for To-Pet personnel, involved in transportation.

To-Pet are contracted as cyanide transporters by cyanide manufacturers and mine sites to transport solid cyanide by road from the relevant Port to the appropriate gold mine within Turkey. To-Pet's main operations base is situated in close proximity to the Port of Izmir. Cyanide is received at the relevant Port by sea in containers, which each hold approximately 20 one-ton boxes of solid cyanide.

To-Pet's Code responsibilities commence on collection of the containers from the relevant Port. To-Pet's vehicles collect the containers and appropriate documentation. The containers of cyanide, in all cases, are then transported in escorted convoy to the appropriate mine.

3.0 SUMMARY AUDIT REPORT

Auditors Findings

To-Pet - Turkey

☒ **in full compliance with the International Cyanide Management Code**

☐ in substantial compliance with

☐ not in compliance with

This operation is in FULL COMPLIANCE with the International Cyanide Management Code.

Audit Company: Golder Associates

Audit Team Leader: Dale Haigh - Lead Auditor

Email: dhaigh@golder.com

Dates of Audit

The Certification Audit was undertaken over 2 days, between 16 July and 17 July 2019.

The audit was undertaken by Dale Haigh of Golder Associates. Dale Haigh is pre-certified as an ICMI Lead Auditor and ICMC Transport Specialist and he acted in this capacity during the audit.

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Verification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

To-Pet - Turkey		
Name of Facility	Signature of Lead Auditor	Date
To-Pet, Turkey		October 2019

4.0 PRINCIPLE 1 – TRANSPORT

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

Transport Practice 1.1: **Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 1.1? Explain the basis for the finding.**

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Transport Practice 1.1**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

The transporter implements processes and procedures to select transport routes that minimize the potential and potential impacts of accidents and/or releases.

The routes between the port and the mine site are the most direct route with main roads in good condition. The selection process is therefore supported by this. Hazards associated with this route are noted in the route risk assessments.

To-PET produce the route risk assessment that is used as the basis for determining the route. The following are considered as part of the route selection process/procedure:

Road Structure and Road Condition; Emergency Lane; Trip Planning and Trip Length; Field Structure; Natural Events; Climate Conditions; Visibility; Night-Time Risks and Clarity; Security; Traffic Density - Road Risks – Speeds, Livestock and Agriculture; Population Density; Accident Likelihood (Black Spots and Hot Spots); Environment; Communication; and Immediate Support.
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Ongoing monitoring of the routes is performed through daily logs (Journey Management Plans - JMPs) made during each convoy and these are fed into the route risk assessments. The route risk assessments will be updated approximately annually.

Examples of instructions given within the route assessments include lowering speed in built up areas.

Drivers, Convoy Supervisors and the ER (Emergency Response) Team are provided with training by Hydra and briefed on a regular basis (at the start of every consignment and at the start of each day during the two-day convoy) and warned of changes in route conditions.

To-Pet contacts the relevant Port, the Mine site, and hospitals along the route and relevant information used to influence the selection process where relevant.

To-Pet report that there are no special safety or security concerns currently. However, should any such issues arise then they would re-evaluate their plans and modify them accordingly. They have carried out a small

number of trial convoys this year and additional coveys along the same route with another supplier over the past three years and no security issues have been experienced.

A minimum of five trucks and two support vehicles would carry cyanide for each trip. The drivers receive training (ADR (International Carriage of Dangerous Goods by Road), Chemical (including cyanide) and Emergency Response).
In addition to convoys, additional security measures are implemented for the material including the use of locked and sealed containers, and the use of locking plates, convoy monitors at the front and rear and advising mines of expected arrival times.

To-Pet contacts the Port, the Mine site, and hospitals along the route. Hydra has a written emergency plan and this clearly states the roles and responsibilities of external parties. Calls are made by Hydra every six months to the emergency responders to check contact numbers and ask hospitals about their ability to provide a cyanide antidote.

Transport Practice 1.2: **Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 1.2? Explain the basis for the finding.**

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 1.2; ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

To-Pet only uses trained and competent operators to operate its vehicles. There is a requirement in Turkey for drivers to be licensed for HGV (Heavy Goods Vehicles) vehicles and for dangerous goods transport (ADR). To-Pet holds a record of all drivers used which includes Government office note, contract with To-Pet, driver identification, driver licence, ADR training certificate, resident's information, medical report, training certificates.

The training programme includes the following modules:

- HSE Induction
- ADR (for relevant To-Pet drivers);
- Emergency Response Plan;
- Working with Chemicals (including Cyanide).

To-Pet and the ER Team (Hydra) maintain records of the training provided to personnel within a matrix.

To-Pet and Hydra Drivers and convoy leaders were interviewed about their knowledge of the procedures and practices involving operating cyanide handling and transport equipment. Responses received indicated that they were competent to perform their jobs in a manner that minimises the potential for cyanide releases and exposures.

Transport Practice 1.3:	**Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 1.3? Explain the basis for the finding.**	
	☒ **in full compliance with**	
The operation is	☐ in substantial compliance with	**Transport Practice 1.3**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

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

To-Pet only use equipment designed and maintained to operate within the parameters of the cyanide loads it will be handling. Cyanide manufacturers and suppliers limit the mass of cyanide sent to the Mine to 20 tonnes. This is clearly shown on the chain of custody information provided with each shipment.

The weight of packaging (1.1 tonnes), container (around 3.6 tonnes) and trailer (around 3 tonnes) in addition to the 20 tonnes of cyanide gives a total weight of 27.7 tonnes.

Equipment used to transport cyanide loads consists of road vehicles (tractor units and trailers) that were purchased to a design specification appropriate for the cyanide transport task. These include main tractors with articulation and trailers which can carry only one container. The capacity of the trailer is 29 tonnes (although it is noted by To-Pet that the legal load limit is 28 tonnes) which is greater than the cyanide, packaging and container weights in total (27.7 tonnes). The tractor units have a capacity of 40 tonnes.

To-Pet have registration certificates for all tractors and trailers.
To-Pet maintain records of vehicle specifications. Maintenance history is shown in vehicle log books kept with each vehicle. Vehicles are maintained by the main dealer MAN and Mercedes suppliers.

In addition, each year vehicles are required to complete a TÜV (company providing testing, product certification, qualification, training and knowledge services) inspection.

To-Pet's maintenance procedure is in place and is used to flag up any issues arising from a maintenance perspective. The manager reviews the sheet each week and the responsible person is emailed (15 days in advance).

Prior to the start of each convoy (and at points during the convoy) vehicles and trailers (along with their loads) are checked to ensure they are safe to travel. The Hydra Emergency Response Plan details the checks that should be made to the Emergency Response Vehicles prior to and during the convoy.

Transport Practice 1.4: **Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 1.4? Explain the basis for the finding.**

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Transport Practice 1.4**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

The route risk assessments ensure routes are selected to minimise damage to vehicles and transported cyanide. The route for this supply chain is along good quality roads. Vehicles and trailers selected by To-Pet are designed to carry the loads safely. Inspections carried out by To-Pet and Hydra at the start of the convoy and during the convoy also ensure that the integrity of the producer's packaging is maintained. Chain of custody (Delivery Notes) forms completed by the mine also confirm that the material has been received in an effective state and are retained by To-Pet.

Vehicles carrying cyanide are also tracked by To-Pet using a GPS system. Monitoring is maintained with the convoy and in the event of an issue To-Pet, To-Pet and Hydra management are informed.

Vehicles and their loads are inspected at the Port and during the convoy. Vehicles are also fitted with a GPS system which tracks operational hours.

All cyanide is delivered by sea to the relevant port in Turkey. Containers arrive with placards already in place as attached by the supplier, in accordance with the International Maritime Dangerous Goods (IMDG) Code. These placards remain on all sides of the containers until the containers are unpacked at the mine sites. These provisions and the attachment of the IMO marine pollutant label ensure that all consignments comply with international standards.

The placards used on containers, include:

- UN Numbers; and
- Hazchem classification.

The presence of each sign is checked at the port and during the journey.

The safety program implemented by the transporter includes:
Vehicle inspection forms are completed on a daily basis during the convoy and were observed during the audit.

To-Pet has implemented a preventative maintenance program and uses an electronic system to flag maintenance requirements in advance.
Limitations on operator driver hours are managed by To-Pet. The limitation requirements are indicated in training and at the start of the convoy as well as being stated in the Driver packs.

Solid cyanide is stowed into the sea containers by the supplier. Vehicles and trailer units are designed to hold these containers in a secure manner. At the port, freight containers are secured to vehicles using twist locks, which are designed and constructed to international transport standards. These are also checked at the start of the convoy and during each day of the convoy.

The To-Pet Manager and the Hydra Emergency Response and Convoy leader has authority to modify transport operations and consult with To-Pet drivers and management during a convoy. Discussion with To-Pet confirmed that such communication does occur but that any change in route is expected very rare and would likely be due to road and weather conditions. Any such issues would be recorded.

To-Pet has a drug abuse prevention program. The policy is implemented by drivers. The drug policy is discussed during cyanide training. To-Pet also instigates an alcohol testing process which is completed at the start of each trip.

Records are maintained and inspected for all relevant parts of this element. Records are retained by To-Pet and Hydra.

Transport Practice 1.5: **Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 1.5? Explain the basis for the finding.**

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Transport Practice 1.5 is not applicable as the transporter does not ship cyanide by air or by sea.

Transport Practice 1.6: **Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 1.6? Explain the basis for the finding.**

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 1.6; track cyanide shipments to prevent losses during transport.
Vehicles transporting for To-Pet have several means to communicate with To-Pet, with emergency responders and with the relevant mining operation.

Each convoy has a lead and end vehicle which keep the convoy in view during the entire route. In the event of an issue one of the convoy team (Hydra and To-Pet) in these vehicles would initially follow the Hydra emergency response calling procedure and alert the relevant parties (depending on the incident). In addition, each driver within the convoy has a mobile phone. Telephone numbers are provided at the start of the convoy (the transport

company, the mining operation, To-Pet, emergency responders, Hydra and other drivers) so drivers can get in touch with relevant persons in the event of an issue although drivers are not allowed to use mobile phones whist driving.

All vehicles transporting cyanide are also fitted with GPS which are tracked actively. All vehicles transporting cyanide are also fitted with GPS and are tracked live. Each vehicle is fitted with 3 cameras and there is an emergency button in the vehicle that can be pressed to send a warning signal to To-Pet emergency communication lines.

There are no locations without a signal for the GPS or mobile phone system for the routes that To-Pet is currently involved with.

As part of the pre-start check all communication equipment is checked including mobile phones and the GPS system. All checks are documented as part of the prestart procedures.

Hydra and To-Pet have developed procedures in agreement with To-Pet to track the progress of cyanide shipments including the Emergency Response Plan.

Procedures include:

- Advising the mine when shipments leave the departure point and estimated time and date of arrival of the consignment;
- Logging of convoy movements using telephone calls from the mobile phones from Hydra to To-Pet.

For each convoy, there is a designated departure time and arrival time (including for breaks and overnight stays) and every journey is logged to monitor progress (departure, interim stops, overnight stops etc). All logs are documented.

Shipments are inspected at the start of the convoy and at periods during the convoy. These include visual integrity checks.

Chain of custody (Delivery Notes) forms completed by the mine also confirm that the material has been received in an effective state. Examples were seen during the audit.

All vehicles carry a driver's record which includes a copy of the Safety Data Sheet. Examples were observed during the site visit.

To-Pet provided a number of documents indicating the amount of cyanide involved in shipments during trial convoys.

5.0 PRINCIPLE 2 – INTRIM STORAGE

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

Transport Practice 2.1: **Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 2.1? Explain the basis for the finding.**

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Transport Practice 2.1**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Transport Practice 2.1 is not applicable as To-Pet does not undertake any interim storage of cyanide.

6.0 PRINCIPLE 3 – EMERGENCY RESPONSE

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

Emergency Response Practice 3.1: **Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 3.1? Explain the basis for the finding.**

The operation 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:

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

To-Pet have a contract with Hydra to develop and implement an Emergency Response Plan. The Emergency Response Plan applies to To-Pet (transportation company) as well as Hydra. This is the document to be used in the event of an emergency involving Cyanide.

The document includes the following sections:

- Purpose and Scope
- Descriptions
- Roles, responsibilities and Training
- Equipment and Maintenance
- Communication Plan
- Documents and Sources to be Referred
- Emergency Response operations and Transport Services
- Medical and Physical Health Conditions
- Reporting
- Vehicles

- Weather Forecast Reports
- Attachments – These include road risk assessments, contact details, SDSs etc.

The plan includes communications for the specific route identified and also considers appropriate release scenarios and their management.

The Emergency Response Plan states sodium cyanide bricks and also attaches the Safety Data Sheet for sodium cyanide bricks. The Cyanide Safety Management Plan considers all aspects of the transport infrastructure relevant to To-Pet's activities which involve transfer of solid sodium cyanide from the port to the mine site.

All transport is by road. The Route Risk Assessment provides information on the condition of the road (surface type, number of carriageways and incline), specific hazards at different points along the route and specific precautions to be undertaken such as use of speed limits.

Emergency numbers are also listed in the Emergency Contact list within the Emergency Plan.

Drivers are also provided with training on the hazards.
The plan states the vehicles used are stated as either MAN or Mercedes trucks with twenty feet long trailers.

The plan also states that solid cyanide is packed by the cyanide manufacture in heavy duty plastic bags inside nylon bulk bags which are packaged into UN approved wooden IBCs (Intermediate Bulk Containers) or drums, which are in turn placed within metal shipping containers for transportation. The plan further states that containers are loaded from a back door within the container before being loaded onto the vehicle. In the event of an accident/incident drivers are instructed to inspect for signs of cargo damage or leakage as part of their assessment and information to pass on to the emergency services.

The containers are loaded onto the trailer and locks fitted to prevent movement.

The Emergency Response Plan considers a number of emergency situations and categorises the level of response (Level 1 to 3 with Level 3 being the most severe).
The document has the following sections which specifically describe the response actions for support during an incident and general actions to be considered including:

- Protect individuals, alerting others, securing the incident area, defining the incident zone, containing the spill, using suitable packaging, chemical treatment, spill scenarios, contamination of waterways, and;
- Medical and Physical Health conditions and reporting.
- Communication plan in the event of an incident including the telephone numbers for emergency services and local hospitals;
- The need for calling on national and international experts and teams for a significant incident;
- Details of roles for government officials (including police, firefighters, ambulance service), and the To-Pet Emergency team are also identified within the plan.

The plans also include various release scenarios and considerations.

Emergency Response Practice 3.2: **Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 3.2? Explain the basis for the finding.**

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Transport Practice 3.2**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Hydra provide working with chemical (including cyanide) training to To-Pet drivers and the supervisor and also to the Hydra ER team. Training records were inspected to confirm this. Additional HSE training is provided to all parties including basic job training, PPE, working with chemicals, Field Training, Use of Equipment, Technical Safety and Environmental protection. Hydra develop a training calendar each year for the Emergency Response teams and this includes training on the Emergency Response Plan (refresher every year), HAZMAT training and ADR training.

Interviews were conducted with Hydra and To-Pet staff. This demonstrated that personnel operating cyanide transport equipment or involved in the convoys are appropriately trained and had a good understanding of what to do in the event of an emergency.

The Emergency Response Plan identifies the key roles and responsibilities in the event of an emergency for the following positions:

- Drivers
- Government Officials (Police, firefighters, ambulance service)
- To-Pet/Hydra Emergency Response Team

Specific duties are also stated within the procedure for each emergency scenario considered.

The Emergency Response Plan lists the equipment related to each of the emergency response vehicles that may be used in the convoy. The emergency response equipment listed includes the following:

HCN detectors, ABEK (Organic, Inorganic, SO2 and other acidic gases, Ammonia and derivatives) filter respirators and full-face masks, SCBA and oxygen cylinders, chemical protective gloves and suits (Level A, B and C), chemical resistant boots, first aid kit, stretcher, alcohol test kit, polythene covers (various sizes), chemical sorbent pad and boom, lighting, decontamination set, fire extinguishers, table and chairs, PC tablet, sample bottles, generator, air compressor, cyanide antidote brochure (for Acetone Cyanohydrin antidote), ladder, plastic drums, tools and traffic control equipment. The Transport company and Emergency Response team do not carry the cyanide antidote as this has to be administered by medical practitioners in Turkey.

In accordance with the emergency response plan the equipment is checked monthly using a check list. This list is also used to check the equipment prior to each convoy starting. An Emergency Response Vehicle and associated equipment was inspected during the audit and found to contain all the equipment on the check list. Respirator cartridges were in date and HCN monitors were in calibration.

Emergency Response Practice 3.3: **Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 3.3? Explain the basis for the finding.**

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Transport Practice 3.3**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

The Emergency Response Plan details the notification and communication plan in the event of an incident and includes a notification flow chart and contact numbers. This contact information is reviewed by Hydra every six months and external responders contacted by phone to confirm details.

National and Local Government responders (Governorship, Environmental department, Health Department, Police, Fire, Health Emergency, Highways, Coastguard) have direct codes and so these numbers remain the same and are also stated in the contact list.

Emergency Response Practice 3.4: **Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 3.4? Explain the basis for the finding.**

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Transport Practice 3.4**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

The Emergency Response Plan identifies actions to be considered depending on the incident, location and weather conditions. Key actions identified include containment of any spill and clean-up of solid spills. No chemical treatment is recommended in the plan. The procedure includes details to follow in the event of a spill. The plan also identifies external responders who would provide support in the event of an incident. The Emergency Response Plan states “No chemical treatment on spillage site. Do not use any chemical to destroy the remaining cyanide. Use adsorbing material like sand to clean up the remaining cyanide”. An operational check list is used to guide the clean-up spills process which would be performed by Hydra. It is noted that in the case of significant spill events the regulatory authorities may take over such activities.

The plan also identifies external responders who would provide support in the event of an incident.

Hydra also provides waste management services and would arrange for the disposal of cyanide contaminated wastes. In Turkey waste disposal is well structured. There are (Ministry approved) disposal facilities.

Documentation and authorizations are strict and would be managed by Hydra. Temporary waste storage is also possible at the mine itself.

Emergency Response Practice 3.5: **Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 3.5? Explain the basis for the finding.**

The operation 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:

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

There are provisions for periodically reviewing and evaluating the adequacy of the Cyanide Procedures and they will be implemented.

The Hydra Emergency Plan states that it will be next reviewed in July 2020.

Hydra and To-Pet representatives confirmed that the plan is reviewed on an annual basis with additional changes occurring based on changes to the system that may occur from time to time.

In Turkey, Emergency Response teams are required to carry out two mock drills each year. The mock drills are also identified in the Annual Training Plan. Several records were observed for mock drills performed by the Hydra team. The drills include both cyanide release and exposure scenarios. The Emergency Response Plan is reviewed following each mock drill in light of each mock drill to see if any changes are required.

Signature Page

Golder Associates (UK) Ltd

Dale Haigh
Lead Auditor

Lisa Mitchell
Reviewer

Date: 28 October 2019

DH/LM /ab

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