REPORT

TO-PET - Turkey

ICMI CERTIFICATION SUMMARY REPORT

Submitted to:

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

Submitted by:

Whatton Consulting Limited
21 The Green, Long Whatton, Loughborough LE12 5DA

Summary Report

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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

Address: To-Pet A.S.
Kemalpaşa Mahallesi
7081
Sokak No: 16
Pınarbaşı 35060

State/Province: Izmir

Country: Turkey

Telephone: +90 (232) 479 07 07

E-Mail: muharrem@to-pet.com.tr

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 15 planned routes with starting points at 4 ports. The routes are summarised below:

- Port of Izmir to the Tüprag Kişladağ Uşak Gold Mine
- Port of Izmir to the Koza Eskişehir Kaymaz Gold Mine
- Port of Izmir to the Tümad Balikesir Ivrindi Gold Mine
- Port of Izmir to the Tümad Canakkale Lapseki Gold Mine
- Port of Pendik to the Tüprag Kişladağ Uşak Gold Mine
- Port of Mersin to the Anagold
- Port of Mersin to the Demirexport Sivas Gold Mine
- Port of Mersin to the Koza Kayseri Himmetdede Gold Mine
- Port of Mersin to the Oksüt Kayseri
- Port of Trabzon to the Anagold Erzincan Iliç Gold Mine
- Port of Trabzon to the Koza Gümüşhane Mastra Gold Mine
- Port of Izmir to the Koza Bergama Ovacik Gold Mine
- Port of Izmir to the Söğüt Bilecik Gübretaş Gold Mine
- Port of Izmir to the Sindirgi Zenit Gold Mine
- Port of Izmir to the Sindirgi Polimetal Gold Mine

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.

In 2022, To-Pet also developed an in-house Emergency Response Team. This team and the emergency response equipment were available during the audit and have been included in this recertification audit. To-Pet started using their own Emergency Response team in November 2022.

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 has been contracted by To-Pet to provide an Emergency Response team during the majority of this re-certification period and have provided support to To-Pet with their Emergency Response Plan and setting up their Emergency Response team. Hydra has also provided training for To-Pet personnel, involved in cyanide transportation and emergency response.

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.

This operation has not experienced any compliance issues or significant cyanide incidents during the previous three-year audit cycle.

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: Whatton Consulting Limited

Audit Team Leader: Dale Haigh - Lead Auditor

Email: dalehaigh@whattonconsulting.com

Dates of Audit

The Certification Audit was undertaken over 3 days, between 15 July and 17 November 2022.

The audit was undertaken by Dale Haigh of Whatton Consulting. 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 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.

To-Pet - Turkey		
Name of Facility	Signature of Lead Auditor	Date
To-Pet, Turkey		January 2023

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 route between the relevant port and mine site selected are the most direct route with main roads in good condition. Hazards associated with the routes are noted within the route risk assessments. To-Pet produces the route risk assessments that are used as the basis for determining the route using a standard procedure and consider the following as part of the route selection:
Road Structure and Road Condition; Emergency Lane; Trip Planning and Trip Length; Field Structure; Natural Events (e.g. earthquakes); 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.

Ongoing monitoring of the routes is performed through daily logs and these are fed into the To-PET route risk assessments. To-Pet also completes an annual trip along the route to review conditions. Drivers, Convoy Supervisors and the Emergency Response Team (ERT) are provided with training and briefed on a regular basis and are warned of changes in route conditions.

To-Pet has documented the measures taken to address risks identified with the selected route within the route risk assessments including the distances, speeds and hazards along the route, lower speed on certain crossings, no overtaking on bends and maintaining safe driving practices.

The transporter seeks input from stakeholders in developing risk management measures where necessary. It is noted that the routes selected are the main transport routes with good roads between the relevant port and the mine site. To-Pet contacts the Port, the Mine site along the route and relevant information is used to influence the selection process. To-Pet report that there are no special safety or security concerns currently, but, should any such issues arise then they would re-evaluate their plans and modify them accordingly.

A minimum of five trucks and two support vehicles would normally carry cyanide for each trip. The drivers receive training (ADR, Chemical (including cyanide) and Emergency Response). 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 has subcontracted Hydra to carry out the emergency response planning and they have provided support during this re-certification period and training. To-Pet have also started providing their own emergency response from November 2022.

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 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 and training certificates.

A range of training courses, which To-Pet maintains a record of, have been provided to drivers including:
- HSE Induction;
- Emergency Response;
- Defensive Driving;
- ADR (Dangerous Goods Driving);
- Cyanide Hazard Awareness.

All personnel operating cyanide handling and transport equipment have been trained to perform their jobs in a manner that minimizes the potential for cyanide releases and exposures. A sample of drivers and the ER Team were interviewed about their knowledge of the procedures and practices involving cyanide and provided good responses indicating effective knowledge and experience.

The transport company implements procedures to make the contractor aware of the applicable code requirements and ensure the contractor complies with those requirements. A contractor (Hydra) has provided ER team support during the recertification period and has provided support and training.

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.

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 per container. This is clearly shown on the chain of custody information provided with each shipment. The weight of packaging (around 1.1 tonnes), container (around 3) and trailer (around 3 tonnes) in addition to the 20 tonnes of cyanide gives a total weight of 27.1 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 39 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 (27.1 tonnes). The tractor units have a capacity of 44 tonnes.

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

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. In addition, each year vehicles are required to complete a TÜV inspection. Procedures are in place to verify the adequacy of the equipment for the load it must bear.

To-Pet requires use of equipment designed and maintained to operate within the parameters of the cyanide loads it will be handling and its procedures ensure that vehicles are checked prior to and during transportation of cyanide. In addition, the specification of vehicle and trailer are compatible with the loads it carries. 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).

The Emergency Response Plan details the checks that should be made to the Emergency Response Vehicles prior to and during the convoy.

There are procedures in place to prevent overloading of the transport vehicle being used for transporting the cyanide. The Drivers Manual has a specific requirement to prevent overloading. The loads each vehicle carries is always the same and this is verified at the start of the convoy by To-Pet during the ordering process, during the planning of the convoy and collection of the cyanide at the port. Inspections are carried out daily during the convoy and examples from convoys were observed during the audit. The transport company has a procedure in place to ensure its sub-contractors are in compliance with elements of Transport Practice 1.3 as noted above.

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.

To-Pet follows written procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging. The route risk assessments ensure routes are selected to minimise damage to vehicles and transported cyanide. The routes are along good quality roads. Vehicles and trailers selected by To-Pet are designed to carry the loads safely. Inspections carried out by To-Pet at the start of the convoy and during the convoy also ensure that the integrity of the producer's packaging is maintained.

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

Vehicles and their loads are inspected during the convoy. Waybill/Container Checklist Forms are also provided to the mine site (and signed by them on receipt) and retained by To-Pet confirm that the material has been received in an effective state. Placards and signage are used to identify the shipment as cyanide and are as required by local regulations or international standards.

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. Placards (which are normally closed when not in use) are also present on the trucks and trailers and are opened up so visible when carrying cyanide loads.

The safety program implemented by the transporters includes the following:

- Vehicle inspections prior to every departure/shipment;
- A preventative maintenance program;
- Limitations on operator/driver hours;
- Procedures to prevent loads from shifting;
- Procedure to modify or suspend transportation if conditions require it;
- A drug abuse prevention program; and
- Retention of records documenting that the above activities have been conducted.

To-Pet implements a safety program for cyanide transport through To-Pet and Hydra that includes (where appropriate or applicable) the following aspects:

Vehicle inspections prior to each departure/shipment.

- Vehicle inspections prior to each departure/shipment.
- Vehicle inspection forms (within the Journey Management Plans) are completed on a daily basis during the convoy and were observed during the audit and are held on file for all cyanide transportations. This includes pre-departure inspection of emergency response vehicles (and equipment) and completion of checklists by Hydra and To-Pet and also includes inspection of the sea containers, which contain the cyanide.

A preventive maintenance program.

- To-Pet has implemented a preventative maintenance program and uses an electronic system to flag maintenance requirements in advance.

Limitations on operator or drivers' hours.

- 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. Vehicles are also fitted with a GPS system which tracks operational hours.

Procedures to prevent loads from shifting.

- 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 relevant port in Turkey, 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.

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

- The To-Pet Manager and the 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 to be very rare and would likely be due to road and weather conditions. Any such issues would be recorded.

A drug abuse prevention program.

- 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.

Retention of records documenting that the above activities have been conducted.

- Records are maintained and inspected for all relevant parts of this element as indicated adjacent to each finding. Records are retained by To-Pet.The transport company has procedures in place to ensure that its sub contractors are aware of the Code requirements related to relevant activities required in Transport Practice 1.4.

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. Vehicles have the means to communicate with the transport company, the mining operation, the cyanide producer/distributor and emergency responders.

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 would initially follow the 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 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 and are tracked live (including with cameras on the road and inside the cab). 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 black spots for the GPS or mobile phone system for the routes that To-Pet is currently involved with. The communication equipment is regularly tested to ensure that it functions correctly and is checked prior to the start of each convoy. Mobile phone and GPS connection is also tested during the annual check of each route and any changes result in an update to the route risk assessment.

To-Pet have developed procedures to track the progress of cyanide shipments including the use of Lojisoft tracking software, completion of Journey Management plans used to track actual timing of starts and stops. These requirements are also noted in Driver's Manual, Drivers Instructions and Job Profiles.

Procedures also 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 at convenient stop points

GPS (which is actively monitored) is also used to track progress along the routes

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 (Journey Management Plans) and records maintained.

The transporter uses inventory controls and chain of custody documentation to prevent the loss of cyanide during shipment. Shipments are inspected at the start of the convoy and at periods during the convoy. These include visual integrity checks.

Chain of custody (Waybill) forms and Container Inspection Forms are signed by the mine and also confirm that the material has been received in an effective state. Examples of this documentation was observed during the audit. Shipping records indicate the amount of cyanide in transit and Materials Safety Data Sheets are available during transport.

All vehicles carry a driver's record which includes a copy of the Safety Data Sheet. Examples were observed during the site visit both within the Delivery records and with vehicles.

To-Pet provided a number of documents indicating the amount of cyanide involved in shipments during the last three years. The transport company has a implemented a procedure to ensure that its sub contractors are aware of the applicable Code requirements of Transport Practice.

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.**

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Transport Practice 2.1 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.**

☒ **in full compliance with**

The operation is ☐ 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.

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

The Transporter has an Emergency Response Plan. During the majority of this recertification window, To-Pet have had a contract with Hydra to develop and implement an Emergency Response Plan applied to Hydra's activities as an Emergency Response contractor to To-Pet and for To-Pet as a Transporter.

To-Pet has also commenced (November 2022) carrying out Emergency Response in house with its own trained employees and equipment. To-Pet's own Emergency Response plan reflects this.

Both documents include the following sections:

- Purpose and Scope
- Roles and responsibilities
- Types of Actions
- Classification of Emergency
- Training
- Equipment and Maintenance
- Communication
- Emergency Response operations and Services
- Attachments – These include road risk assessments, contact details, SDSs etc.

a) Both Emergency plans (Hydra and To-Pet) are appropriate for the selected transportation route.

Both documents have sections which are appropriate for the selected transport route including attached 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.

b)The plans consider the physical and chemical form of the cyanide.

The Emergency Response Plans state sodium cyanide bricks and also attaches the Safety Data Sheet for sodium cyanide bricks.

c)The plans consider the method of transport. The sole mode of transport from the port to the mine is by road. The plans include requirements for both the vehicle and the driver. Details of vehicle safety check requirements are also stated. The descriptions of key roles in the event of an accident detailed in the plans include requirements for the drivers.

d)The plans consider 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 assessments provide 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 listed in the Emergency Contact list within the Emergency Plan.

Drivers are also provided with training on the hazards.

e)The plans consider the design of the vehicles being used.

The emergency response plans state the vehicles used are trucks with twenty feet long trailers.

The plans also state that solid cyanide is packed by the cyanide manufacturer in heavy duty plastic bags inside nylon bulk bags which are packaged into UN approved wooden IBCs or drums, which are in turn placed within metal shipping containers for transportation.

The plans further state 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 twist locks fitted to prevent movement.

The plans include descriptions of response actions as appropriate for anticipated emergency situations.

The Emergency Response Plans consider a number of emergency situations and categorises the level of response (Level 1 to 3 with Level 3 being the most severe).

The documents have the following sections which specifically describe the response actions for support during an incident and general actions to be considered including:

- Securing the incident area, defining the incident zone, containing/isolating the spill, using covers, chemical treatment, spill scenarios, consideration of weather, contamination of waterways.
- The plans also include various release scenarios and considerations.
- The Plans identify the roles of outside responders, medical facilities and communities in emergency response procedures, which include the following:
- The emergency plans include a communication plan in the event of an incident including the telephone numbers for emergency services and local hospitals. The role of the medical providers is noted.

The need for calling on national and international experts and teams for a significant incident is also noted along with the relevant contact numbers.

Details of roles for government officials (including police, firefighters, ambulance service), and the To-Pet/Hydra Emergency team are also identified within the plans.

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.**

	☒ **in full compliance with**	
The operation is	☐ 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.

The transporter provides initial and refresher emergency response training for appropriate personnel.

Hydra provide cyanide awareness training to To-Pet drivers and the supervisor and also to the Hydra and To-Pet emergency response teams. 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, hazardous materials and environmental protection. Refresher training is provided to all relevant staff and is performed annually.

Training calendars are developed by Hydra and To-Pet for their staff.

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.

Descriptions are provided of specific emergency response duties and responsibilities of personnel.

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

Drivers
Emergency Responders (police, firefighters, ambulance service)
To-Pet and Hydra Emergency Response Teams

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

The requirements are included in training programmes. During interviews with To-Pet and Hydra staff, they were asked about their roles and the answers were consistent with the procedures.

There is a list of all emergency response equipment that should be available during transport and along the transportation route. Both Hydra and To-Pet Emergency Response Plans list the equipment related to the emergency response vehicles that may be used in the convoy.

The emergency response equipment listed includes the following:
HCN detectors, ABEK filter respirators and full-face masks, SCBA and oxygen cylinders, chemical protective gloves and suits, chemical resistant boots, first aid kit, stretcher, alcohol test kit, polythene covers (various sizes), chemical sorbent pad and boom, lighting, decontamination set, fire extinguishers, sample bottles, generator, air compressor, cyanide antidote brochure (for Acetone Cyanohydrin antidote), ladder, plastic drums, tools and traffic control equipment. This equipment is checked on a regular basis including after and before each cyanide transport convoy. The inspections also include a check of oxygen levels inside the cylinders. Note that the Transport company and Emergency Response team do not carry the cyanide antidote as this has to be administered by medical practitioners in Turkey.

An emergency response vehicle and associated equipment was inspected and found to contain all the equipment on the check list. Respirator cartridges were in date and HCN monitors were in calibration. Oxygen cylinders were observed to be full.

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

Check lists are used to confirm that the equipment is available on the vehicle used in the convoy prior to the convoy commencing. Transport operators receive initial and periodic refresher training in emergency response procedures including implementation of the Cyanide Procedures.

Interviews with drivers of trucks and convoy vehicles confirmed that they understand the requirements set out in the plans. Procedures have been implemented for the inspection of emergency response equipment and to assure its availability when required as indicated in 3.2.3.

The transport company has clearly delineated the roles and responsibilities of its sub-contractor during an emergency response situation.

For the majority of the re-certification period To-Pet has had a contract with Hydra to develop an emergency plan and to provide emergency response and training. Since November 2022 To-Pet also provides emergency response directly and has it's own ER team, vehicle and equipment and has developed its own ER Plan. Further details are provided above.

Responses demonstrate that To-Pet sub-contractors fully carry out the required emergency response duties.

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.

There are procedures (emergency response plan) and current contact information (emergency communication chart) for notifying ICMI, the shipper, receiver/consignee, regulatory agencies, outside response providers, medical facilities and potentially affected communities in the event of an emergency.

The Emergency Response Plans (Hydra and To-Pet) detail the notification and communication plan in the event of an incident. The Emergency Plans detail the contact numbers including for ICMI. A list of all internal and external contacts is provided and includes the relevant mine site.

To-Pet (and Hydra via To-Pet) contacts the relevant 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 every six months to the emergency responders to check contact numbers.

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.

Systems are in place to ensure that internal and external emergency contact information and reporting procedures are kept current.

There have been no cyanide related emergencies since the operation's November 13, 2019 certification.

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.

There are 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.

Both Hydra and To-Pet Emergency Response Plans identify 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 plans.

The procedures include details to follow in the event of a spill including:

- Protect Yourself
- Alerting
- Secure Area
- Define Hot Zone
- Cover / Contain spilled material
- Use suitable salvage packaging
- No Chemical treatment on spillage site
- Chemical analysis

The ER Plans provide details which guide the clean-up spills process. It is noted that in the case of significant spill events the regulatory authorities will likely take over such activities.

The ER Team 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 the ER Team. Temporary waste storage is also possible at the mines also.

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

The procedures prohibit the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water.

Both plans state that no chemical treatment is allowed on the spillage site. Chemicals are also not to be used to destroy the remaining cyanide instead requiring the use of adsorbing material like sand to clean up the remaining cyanide. In addition, it was confirmed in interviews that training reinforces the idea that such chemicals cannot be used to treat the cyanide.

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 Emergency Plans and they will be implemented. Hydra and To-Pet representatives confirmed that their plans are reviewed on an annual basis with additional changes occurring based on changes to the system that may occur from time to time.

There are provisions for periodically conducting mock emergency drills and they have been and will continue to be implemented. Mock drills are also identified in training plans.

Records were observed for mock drills performed by the Hydra and To-Pet teams and this included photographic and video records of the drills. The drills included both cyanide release and exposure scenarios. There is a procedure to evaluate the performance of the emergency response plan after its implementation and this will be followed.

The Emergency Response Plan Revision Record details the date of publication, new revision number and a description of the revision. The document history shows that a number of variations have been implemented over the past three years. The Emergency Response Plan is reviewed following each mock drill in light of each mock drill to see if any changes are required.

There have been no cyanide related emergencies since the operation's November 13, 2019 certification.

Signature Page

Whatton Consulting Limited

Dale Haigh
Lead Auditor

Date: January 2023

Whatton Consulting Limited