May 2014

INTERNATIONAL CYANIDE MANAGEMENT CODE - CYANIDE SUPPLY CHAIN AUDIT

Toll Mining Services Australian Supply Chain Certification Audit Summary Audit Report

Submitted to:
International Cyanide Management Institute
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UNITED STATES OF AMERICA

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REPORT

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1.0 INTRODUCTION

1.1 Operational Information

Name of Transportation Facility:	Toll Mining Services
Name of Facility Owner:	Not Applicable
Name of Facility Operator:	Toll Global Resources
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1.2 Description of Operation

1.3 Australian Cyanide Transportation Supply Chain Scope

The TMS Australian Supply Chain covers:

- The transportation of solid cyanide within containerised intermediate bulk containers (IBCs) and sparge isotainers, and liquid cyanide in isotainers from Orica Australia Limited's (Orica) Yarwun Production Facility, Australia to the customer mine sites throughout Australia by rail and road.
- The transport of solid cyanide within containerised intermediate bulk containers (IBCs) and liquid cyanide in isotainers produced by Australian Gold Reagents' (AGR) Kwinana Production Facility from the Kalgoorlie Rail Terminal to customer mine sites by road. AGR is a certified transporter and the transport of cyanide from AGRs production facility to the Kalgoorlie Rail Terminal is part of AGRs certified supply chain.

The elements comprising the TMS Australian Supply Chain is illustrated in Figure 1, listed below and described in Section 1.4:

Queensland

- Road transporters
  - TMS, Brisbane (Head Office)
  - TMS, Gladstone

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- Aurizon Holdings Ltd (Aurizon), Mount Isa.
- KJP Haulage
- Havouc Transport.

- Rail
  - Aurizon Acacia Ridge Rail Terminal.
  - Aurizon Mount Isa Rail Container Terminal
  - Aurizon Mount Miller Dangerous Goods and Industrial Siding, Gladstone.

New South Wales

- Road transporters
  - TMS, Dubbo
  - Toll Customised Solutions (TCS), Arndell Park.
- Rail
  - Qube Logistics (Qube) Port Botany Container Park
  - Pacific National Chullora Rail Terminal
  - Fletchers International Exports (Fletchers) Rail Terminal, Dubbo.

Victoria

- Road transporters
  - TCS, Laverton.
- Rail
  - Aurizon, Dynon Rail Terminal.

Western Australia

- Road transporters
  - TMS, Kalgoorlie
  - Skynight Pty Ltd (Skynight), Kalgoorlie.
- Rail
  - Aurizon West Kalgoorlie Rail Terminal.

Figure 1 provides a topological schematic of the TMS Australian Supply Chain.

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Toll Australian Supply Chain Legend

Rail — Rail Operator
Road — Road Operator
Rail Depot
Toll Depot
Gold Mines *Site Name*

Not Part o f Toll Supply Chain

NT Mines Sites
Tanami Granites

QLD Mine Sites
Mt Rawdon
Cracow

Aurizon Transport

Mt Isa, QLD

Aurizon Rail

Mt Miller, QLD

TMS Gladstone/KJP Haulage/Havouc

Orica Cyanide Production Facility Yarwun, QLD

Forrestfield Rail Loop

AGR Cyanide Production Facility Kwinana, WA

Aurizon Rail

Kalgoorlie, WA

Aurizon Rail

Acacia Ridge,NSW

Aurizon Rail

Aurizon Rail

Pacific National Rail

TMS Kalgoorlie

Dynon, VIC

Chullora, NSW

TCS

Toll Customised Solutions (TCS)

WA Mine Sites
Darlot
Lawlers
Plutonic
KCGM
Kanowna Belle
Sunrise Dam
Granny Smith
Telfer

TMS West

Skynight Transport

TCS Laverton

Orica Cyanide Production Warehouse Laverton, VIC

QUBE, NSW

Fletcher International

DUBBO, NSW

TMS Dubbo

TMS Dubbo

Havouc Transport

TMS Dubbo

NSW Mine Sites
Cowal
Peak

Rev 0

CLIENT: Toll Mining Services		PROJECT: TMS Cyanide Code Certification	
DRAWN: MCW	DATE: 14/05/2014	TITLE: **TOLL AUSTRALIAN CYANIDE SUPPLY CHAIN**	
CHECKED: EWC			
SCALE: NOT TO SCALE	A4	PROJECT No: 137648018	FIGURE No: **Figure 1**

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1.4 Road Transportation

TMS conducts road transportation within the Australian Supply Chain through the use of various divisions and subcontractors.

1.4.1 Toll Mining Services

TMS, part of Toll Global Resources (TGR), provides individual and integrated transport and logistics services where required by the customers in the various segments of the mining logistics chain. TMS provides integrated logistics solutions from supply chain to camp management. TMS is divided into two main operating businesses (Onsite and Inbound/Outbound), both of which are headquartered in Brisbane. Its operations are located around Australia in Newcastle, Gladstone, Central Queensland, Townsville, Cloncurry, Mount Isa and Kalgoorlie.

1.4.2 Toll Customised Solutions

TCS, part of the TGR group, provide supply chain logistics services for end-to-end management of customers' supply chains, including warehousing and freight movement. In the scope of this audit, TCS provide freight services for the transportation of cyanide for parts of the supply chain in New South Wales and Victoria.

1.4.3 Aurizon

Aurizon, formally QR National, is Australia's leading bulk freight specialist with an extensive fleet of locomotives and wagons. From Mount Isa, Queensland, Aurizon now provides road transportation for cyanide following the acquisition of Isa Freight Express, who formally provided road transport as part of the Orica Australian Supply Chain.

1.4.4 KJP Haulage

KJP Haulage provides bulk tanker haulage on a subcontracting basis to TMS Gladstone. KJP Haulage delivers to a number of customer mines in Queensland and New South Wales. Transportation of cyanide for TMS is undertaken utilising the systems and procedures established by TMS.

1.4.5 Havouc Transport

Havouc Transport is a single owner operator who provides bulk tanker haulage on a subcontracting basis to TMS Gladstone. Havouc Transport delivers to a number of customer mines in Queensland and New South Wales. Transportation of cyanide for TMS is undertaken utilising the systems and procedures established by TMS.

1.4.6 Skynight

Skynight provides bulk tanker haulage on a subcontracting basis to TMS Kalgoorlie. Skynight delivers to a number of customer mines in the Kalgoorlie region of Western Australia. Transportation of cyanide for TMS is undertaken utilising the systems and procedures established by TMS.

1.5 Rail Transportation

1.5.1 Aurizon

Aurizon's intermodal business transports general freight, industrial freight and specialised bulk freight to a diverse customer base across Australia. Within the scope of this audit, Aurizon transport cyanide via rail to a number of Rail Terminals in Queensland, New South Wales and Western Australia, whereby the cyanide is transited through to a road transporter for onward delivery.

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1.5.2 Qube Logistics

Qube Logistics is Australia's single biggest provider of integrated port logistics services. Qube's Port Botany Container Park is located in the industrial/port precinct and well positioned for intermodal transfers and storage.

Qube is utilised as a component of the cyanide distribution chain whereby it acts as the connection point between Botany and Dubbo. Full sparge isotainers are taken to Qube for connection through to Fletchers Rail Terminal and empty sparge isotainers are collected at Qube for transfer to Chullora Rail Terminal.

1.5.3 Pacific National

Pacific National is one of Australia's largest rail freight businesses. The Pacific National Chullora rail terminal facility is a transitory facility for inbound and outbound goods to and from Botany through to Dubbo. All products are in transit only. The rail connection to Chullora from Yarwun ends at Chullora, whereby road transport will transfer the product to the next rail connection.

1.5.4 Fletchers International Export

The Fletchers Rail Terminal is located in a semi-rural/industrial area in Dubbo, New South Wales. It is the final rail connection for the transportation by road of full and empty sparge isotainers to and from customers in the Dubbo region.

1.6 Transit Storage

Within the scope of this audit, there are three trans-shipping depots or interim storage sites, as defined in the audit protocol. Other than the three sites described below, at no stage is cyanide stored in transit for more than 24 hours on a vehicle or removed from the trucks or freight containers prior to unloading at customer mine sites.

1.6.1 TCS Laverton Depot

The TCS Laverton Depot is a node for the domestic and international shipment of cyanide through the Port of Melbourne in Victoria. The TCS Laverton Depot provides interim storage of cyanide under a contract arrangement for one certified cyanide producer, which is assessed under a production facility audit for that supplier.

1.6.2 TMS West Kalgoorlie Depot

The TMS West Depot in Kalgoorlie, Western Australia, provides ad-hoc interim storage for cyanide shipments in transit. Cyanide is collected from the Kalgoorlie Rail Terminal and transported via road to the depot. The trailer with the cyanide container is parked in the designated bunded location. At no stage is the cyanide removed from the container or the container removed from the trailer. Typically storage at the depot is limited to two days in duration.

1.6.3 TMS Dubbo Depot

At the TMS Dubbo Depot in New South Wales, cyanide is collected from the Fletchers Rail Terminal and transported via road to the site. The trailer with the cyanide container is either parked on site for less than 24 hours or the container is placed in a designated area for up to a week.

1.7 TMS Systems Overview

TMS is a subcontractor for both Orica and AGR, and both Orica and AGR are certified under the Code as transporters and have systems in place that meet Code requirements. TMS implements and maintains their clients systems, tools and procedures where required and has adopted both AGR and Orica systems for their respective client supply chains.

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TMS has developed their own management system that meets Code requirements and is in the process of transitioning from client derived processes to their own, where practical. The route risk assessments and consultation processes completed in consultation with the suppliers AGR and Orica, although different in approach, meet Code requirements and are still considered valid.

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1.8 Auditors Findings and Attestation

	☒ **in full compliance with**	
TMS Australian Supply Chain is:	☐ in substantial compliance with	**The International Cyanide Management Code**
	☐ not in compliance with	

Audit Company:	Golder Associates Pty Ltd
Audit Team Leader:	Edward Clerk, CEnvP (112), RABQSA (020778)
Email:	eclerk@golder.com.au

1.9 Name and Signatures of Other Auditors:

Name	Position	Signature	Date
Edward Clerk	Lead Auditor and Technical Specialist		28 May 2014
Mike Woods	Auditor		28 May 2014

1.10 Dates of Audit

The Certification Audit was conducted between June 2013 and November 2013. The locations and dates of the field component are specified below:

- TMS, Brisbane (Head Office), Queensland — 25 to 27 June 2013
- TMS, Gladstone, Queensland — 27 to 28 June 2013
- KJP Haulage, Gladstone, Queensland — 27 June 2013
- Havouc Transport, Gladstone, Queensland — 28 June 2013
- Aurizon, Mount Isa, Queensland — 23 June 2013
- TCS, Arndell Park, New South Wales — 15 July 2013
- TMS, Dubbo, New South Wales — 16 July 2013

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- TMS, Kalgoorlie, Western Australia 3 July 2013
- Skynight, Kalgoorlie, Western Australia 3 July 2013
- TCS, Laverton, Victoria 13 August 2013 and 25 September 2013.

The audit relied upon the following Due Diligence reports:

- Due Diligence – Aurizon. Conducted by Sheena Ward, Regional HSET Manager, Toll Global Resources on 11 April 2013.
- Due Diligence – Pacific National. Conducted by Sheena Ward, Regional HSET Manager, Toll Global Resources. 11 April 2013.
- Due Diligence – Fletchers International Exports. Conducted by Sheena Ward, Regional HSET Manager, Toll Global Resources on 22 May 2013.
- Due Diligence – Aurizon West Kalgoorlie Rail Terminal. Conducted by Sheena Ward, Regional HSET Manager, Toll Global Resources on 13 May 2013.
- Due Diligence – Aurizon Mount Isa Rail Container Terminal. Conducted by Sheena Ward, Regional HSET Manager, Toll Global Resources on 28 May 2013.
- Due Diligence – Aurizon Mt Miller Dangerous Goods and Industrial Siding. Conducted by Robert Orbell, Operations Supervisor, Toll Global Resources and Sheena Ward, Regional HSET Manager, Toll Global Resources on 23 April 2013.
- Due Diligence – Aurizon Acacia Ridge Rail Terminal. Conducted by Sheena Ward, Regional HSET Manager, Toll Global Resources on 12 September 2003.
- Due Diligence – Aurizon Dynon Melbourne Rail Terminal. Conducted by Sheena Ward, Regional HSET Manager, Toll Global Resources on 7 May 2013.
- Due Diligence – Qube Port Botany Container Park. Conducted by Sheena Ward, Regional HSET Manager, Toll Global Resources on 21 May 2013.
- Due Diligence – Pacific National Chullora Rail Terminal. Conducted by Sheena Ward, Regional HSET Manager, Toll Global Resources on 21 May 2013.
- Due Diligence – Fletchers Rail Terminal. Conducted by Sheena Ward, Regional HSET Manager, Toll Global Resources on 22 May 2013.

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.

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2.0 CONSIGNOR SUMMARY

2.1 Principle 1 - Transport

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

2.1.1 Transport Practice 1.1

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

	☒ **in full compliance with**	
The Supply Chain	☐ in substantial compliance with	**Transport Practice 1.1**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

TMS is in FULL COMPLIANCE with Transport Practice 1.1, requiring the operation to purchase cyanide from manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment.

TMS

TMS implements a procedure for selecting transport routes that minimises the potential for accidents and releases or the potential impacts of accidents and releases. The process is led by TMS in consultation with TGR.

The *Conducting Route Assessments* procedure states that route assessments should be completed to identify potential risks along proposed routes and/or nominated current approved routes.

Changes to the route assessment must be done via consultation with TMS Business Unit Manager and the Customer. Final approval of any route assessment is at the discretion of the customer provided they do not contravene any regulatory bodies.

TMS also has procedures to evaluate the risks of selected cyanide transport routes and take the measures necessary to manage these risks. Procedures require a full route risk assessment to be conducted and reviewed annually.

TMS provides transportation services for both Australian based cyanide manufactures (AGR & Orica). TMS has previously utilised the risk assessment process of each producer to assess transport routes for the respective mine customers. TMS collaborated with their subcontractors and the relevant producer in conducting the risk assessments and the assessments meet the requirements of both companies and the Code.

TMS is in the process of aligning the risk assessment processes and outputs to establish consistency across the TGR business and ensure the assessments meet TGR's internal standards.

The risk assessments undertaken in conjunction with the suppliers meet the requirements of the Code. The risk assessments consider the nature of the hazards/threat and detail the control actions to be implemented to mitigate the risk. There is a tiered hierarchy of response based on the assessed risk level up to and including ceasing operations.

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TMS has implemented a procedure and process to periodically re-evaluate routes used for cyanide deliveries. The procedure requires trucking subcontractors to assist in the review of transport route assessment on an ongoing basis by highlighting any necessary changes or precautionary measures necessary to manage and identify hazards along the route.

Procedures require route assessments to be reviewed when there is a change, an on road incident occurs or every two years.

TMS submits *Route Assessment Review Request* forms, which state that route assessments are required to be reviewed every two years. These indicate whether the review was desktop or driven, with a check provided to ensure reviews are not always desktop.

TMS also has a *Cyanide Drivers Trip Log* which includes notes on the trip conditions such as weather and road works. This log also gives a phone number for the cyanide producer if there are any significant issues.

At the time of the audit, TGR was in the process of introducing a more detailed driver feedback process (*Cyanide Drivers Brief Adjustment Form*). The intent is that this will enable the drivers brief to be refined and highlight risk for the route in a concise manner.

TMS has documented the measures taken to address risks identified with the selected routes.

TMS has developed procedures to evaluate the risks of selected cyanide transport routes and take the measures necessary to manage these risks.

The *Hazard Identification and Risk Management* procedure describes the process for development and maintenance of an ongoing risk management system, in accordance with *AS/NZS ISO 31000:2009 Risk Management*. Risks are tabulated in each Master Route Assessment at different aspects of the route showing the hazard/threat and control actions to mitigate the hazard.

Measures to manage risks are also documented in route instructions issued to the driver in the Drivers Brief. These are condensed forms of the Master Route Assessment that denote distance along the route, specific hazard or issue, a corresponding coloured picture, and control measure to manage the identified hazard. The route assessment documentations are used for training purposes and pre-departure briefings.

TMS, through collaboration with the Australian based cyanide producers, seeks input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures. The community is indirectly consulted.

Within Australia, cyanide can only be transported along government-designated dangerous goods routes. The designation of any new dangerous goods routes is a consultative process between the government and stakeholders, including affected communities. The process is coordinated by the government usually at the request of the customer requiring the product.

Where multiple designated dangerous goods routes exist, the route selection and risk assessment process is used to ascertain which is the preferred route and what management measures should be utilised in the transportation of cyanide along the route.

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

- The community has the opportunity to comment during the designation of dangerous goods routes.
- The community was not designated a role as part of the planned response to an emergency involving cyanide, negating the need for community consultation on this issue.

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- The risk management measures implemented for the cyanide transportation are considered a high standard and negate the need for community consultation in the development of such measures.

No routes were identified as having special safety or security concerns that require the use of convoys, escorts or other additional safety or security measures to address the concern.

Australia is assessed as having a low security risk and consequently does not require cyanide to be transported in convoy. Despite this, security measures are implemented by for transportation of cyanide within Australia including the use of locked and sealed containers, and constant monitoring of the progress of the convoy along the route using a GPS tracking system.

The notification of external responders, medical facilities and communities of their roles and/or mutual aid during an emergency response is undertaken by Producer's as part of their responsibilities.

TMS has conducted emergency exercises that include external responders. Following this, the responders are sent and can comment on the exercise report. These reports are also shared with the rest of TMS.

Within Australia, the State Governments have established civil response capabilities whose remit includes responding to hazardous materials incidents. The governments control the dangerous goods routes and collect information on the nature of dangerous goods transported. Civil response agencies such as the Fire and Emergency Services (FESA) in Western Australia, Queensland Fire and Rescue, Melbourne Fire Brigade together with assistance from State Police take control on emergency situations to protect the public. The TMS emergency response process is to isolate the area contact emergency services and the cyanide producer. The two Australian cyanide producers have established 24 hour emergency contact centres to provide advice and technical support to responders. The TMS emergency response process does not designate roles for other entities or have mutual aid agreements outside of the agreements with the cyanide producers.

TMS does utilise subcontracted companies to transport cyanide. The transport companies are required to abide by TMS procedures including delivery procedures training requirements and emergency response.

The CTMP states that:

> *TMS have notified its contractors of their responsibilities with regard to compliance and that they take measures as necessary to ensure compliance with TMS Procedures and external requirements like the International Cyanide Management Code.*

The *Subcontractor Management* procedure specifies the process by which TGR ensures subcontractors conduct their activities in accordance with legislative requirements and consistent with TGR policies and procedures. TGR and TMS undertake audits of subcontractors for compliance with TMS requirements. Complete audits were reviewed and TMS has a system for tracking actions identified through the audit process.

KJP Haulage

KJP Haualge operates under and is guided by the procedures and process put in place by TMS to select cyanide transport routes to minimise the potential for accidents and releases.

KJP Haulage does not select transport routes in the performance of its duties under the Australian Supply Chain. This is undertaken by TMS.

KJP Haulage implements TMS' systems and procedures for the evaluation of risks associated with the selected transport routes and adopts relevant TMS measures to manage those risks.

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KJP Haulage adopts TMS' systems and procedures for the provision of feedback on route conditions.

KJP Haulage utilises TMS' systems and procedures to document the measures taken to address risks identified with the route(s) that it travels.

All engagement with external stakeholders is undertaken and/or managed by TMS.

If safety or security concerns arise along the routes that it transports cyanide for TMS, KJP Haulage will adopt appropriate measures determined by TMS.

Havouc Transport

Havouc Transport operates under and is guided by the procedures and process put in place by TMS to select cyanide transport routes to minimise the potential for accidents and releases.

Havouc Transport does not select transport routes in the performance of its duties under the Australian Supply Chain. This is undertaken by TMS.

Havouc Transport implements TMS' systems and procedures for the evaluation of risks associated with the selected transport routes and adopts relevant TMS measures to manage those risks.

Havouc Transport adopts TMS' systems and procedures for the provision of feedback on route conditions.

Havouc Transport utilises TMS' systems and procedures to document the measures taken to address risks identified with the route(s) that it travels.

All engagement with external stakeholders is undertaken and/or managed by TMS.

If safety or security concerns arise along the routes that it transports cyanide for TMS, Havouc Transport will adopt appropriate measures determined by TMS.

Skynight

Skynight operates under and is guided by the procedures and process put in place by TMS to select cyanide transport routes to minimise the potential for accidents and releases.

Skynight does not select transport routes in the performance of its duties under the Australian Supply Chain. This is undertaken by TMS.

Skynight implements TMS' systems and procedures for the evaluation of risks associated with the selected transport routes and adopts relevant TMS measures to manage those risks.

Skynight adopts TMS' systems and procedures for the provision of feedback on route conditions.

Skynight utilises TMS' systems and procedures to document the measures taken to address risks identified with the route(s) that it travels.

All engagement with external stakeholders is undertaken and/or managed by TMS.

If safety or security concerns arise along the routes that it transports cyanide for TMS, Skynight will adopt appropriate measures determined by TMS.

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Due Diligences – Rail Operators

TMS use rail operators at the request of their cyanide manufacture. The routes are set and rail is often preferred transportation method.

Aurizon

TMS conducted compiled a due diligence of Aurizon on 11 April 2013. The assessment found that Aurizon meets TMS' operational requirements.

Pacific National

TMS conducted compiled a due diligence of Pacific National on 11 April 2013. The assessment found that Pacific National meets TMS' operational requirements.

Fletchers International Exports

TMS conducted compiled a due diligence of Fletchers on 22 May 2013. The assessment found that Fletchers meets TMS' operational requirements.

Due Diligences – Rail Terminals and Sidings

The selection of rail terminals is dictated by the rail carrier.

Aurizon West Kalgoorlie Rail Terminal

TMS conducted a due diligence of the Aurizon West Kalgoorlie Rail Terminal on 13 May 2013. The assessment found that the facility meets TMS' operational requirements.

Aurizon Mount Isa Rail Container Terminal

TMS conducted a due diligence of the Aurizon Mount Isa Rail Container Terminal on 28 May 2013. The assessment found that the facility meets TMS' operational requirements.

Aurizon Mount Miller Dangerous Goods and Industrial Siding

TMS conducted a due diligence of the Aurizon Mt Miller Dangerous Goods and Industrial Siding on 23 April 2013. The assessment found that the facility meets TMS' operational requirements.

Aurizon Acacia Ridge Rail Terminal

The selection of rail terminals is dictated by the rail carrier. TMS conducted a due diligence of the Aurizon Acacia Ridge Rail Terminal on 12 September 2013. The assessment found that the facility meets TMS' operational requirements.

Aurizon Dynon Melbourne, Rail Terminal

TMS conducted a due diligence of the Aurizon Dynon Rail Terminal on 7 June 2013. The assessment found that the facility meets TMS' operational requirements.

Qube Logistics Port Botany Container Park Rail Terminal

TMS conducted a due diligence of the Qube Port Botany Container Park on 21 May 2013. The assessment found that the facility meets TMS' operational requirements.

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Pacific National Chullora Rail Terminal

TMS conducted a due diligence of the Pacific National Chullora Rail Terminal on 21 May 2013. The assessment found that the facility meets TMS' operational requirements.

Fletchers International Exports Rail Terminal

TMS conducted a due diligence of the Fletchers Rail Terminal on 22 May 2013. The assessment found that the facility meets TMS' operational requirements.

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2.1.2 Transport Practice 1.2

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

	☒ **in full compliance with**	
The Supply Chain	☐ in substantial compliance with	**Transport Practice 1.2**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

TMS is in FULL COMPLIANCE with Transport Practice 1.2 requiring personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

TMS

TMS uses only trained, qualified and licensed operators to operate its transport vehicles. TGR has a database that stores all training records of employees, with expiry dates noted where relevant. TMS's training needs analysis indicates which roles require particular training, with the training matrix showing employees and dates of training, plus expiry dates. The training matrix includes all TMS operating companies and subcontractors.

The CTMP states required training for transport of cyanide and that all training should be competency based and comply with all applicable TMS training standards.

Training relevant to cyanide is undertaken by all operators, with sodium cyanide awareness training undertaken by all TMS staff and relevant subcontractors.

The CTMP document notes that TMS personnel are required to be trained in Sodium Cyanide Safety Awareness and Emergency Response. Both these units contain information on minimising the potential for cyanide releases and exposures.

A review of training records and an interview of drivers confirmed training was conducted.

TMS does utilise subcontracted companies to transport cyanide. The transport companies are required to abide by TMS procedures including delivery procedures training requirements and emergency response.

TGR undertake audits of subcontractors for compliance with TMS requirements.

KJP Haulage

KJP Haulage drivers must meet TMS training, qualification and licensing requirements prior to transporting cyanide. The TMS training matrix includes KJP Haulage drivers.

Havouc Transport

Havouc Transport drivers must meet TMS training, qualification and licensing requirements prior to transporting cyanide. The TMS training matrix includes Havouc Transport drivers.

Skynight

Skynight drivers must meet TMS training, qualification and licensing requirements prior to transporting cyanide. The TMS training matrix includes Skynight drivers.

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2.1.3 Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

	☒ **in full compliance with**	
The Supply Chain	☐ in substantial compliance with	**Transport Practice 1.3**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

TMS is in FULL COMPLIANCE with Transport Practice 1.3 requiring that transport equipment is suitable for the cyanide shipment.

TMS

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

TMS maintains a dedicated fleet of prime movers and trailers to transport cyanide freight containers, liquid isotainers and sparge isotainers. Equipment specifications are recorded on an approved equipment register. The equipment list maintains information on all TMS equipment authorised to transport cyanide products (including subcontractor's equipment).

TMS vehicles involved in the transportation of cyanide are subject to two layers of preventative maintenance:

- TMS servicing comprising an "ABC" maintenance scheme that includes checks on the structural integrity of the vehicles
- Maintenance Management Accreditation Servicing as part of the NHVAS.

Excluding scheduled servicing, TMS also utilises documented pre-departure checks that also require drivers to comment on the condition of the vehicle, including frame and panel security and tyre condition.

TMS's Operations Coordinator advised that, in the majority of cases, the equipment placed on the list has been purchased specifically to transport cyanide products and consequently the equipment was purchased to specific design specifications.

TMS has procedures in place to verify the adequacy of the equipment for the load it must bear. Checks are completed as part of the scheduled servicing, pre-departure checks and defect card system.

Procedures are in place to prevent overloading of the transport vehicle being used for handling cyanide. TMS maintains a dedicated fleet of prime movers and trailers, with appropriate design capacities, to transport cyanide containers, liquid isotainers and sparge isotainers.

TMS does utilise subcontracted companies to transport cyanide. The transport companies are required to abide by TMS procedures including delivery procedures training requirements and emergency response.

TGR undertake audits of subcontractors for compliance with TMS requirements.

KJP Haulage

KJP Haualge operates under and is guided by the procedures and process put in place by TMS to ensure that transport equipment is suitable for the cyanide shipment.

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All KJP Haulage vehicles used to transport cyanide for TMS are subject to TMS' systems and procedures to ensure that equipment is designed and maintained to operate within the loads it will be handling.

All KJP Haulage vehicles used to transport cyanide for TMS are subject to TMS' procedures that verify the adequacy of the equipment for the load it must bear.

KJP Haulage operates according to the TMS procedures that are in place to prevent overloading of the transport vehicle being used for handling cyanide.

Havouc Transport

Havouc Transport operates under and is guided by the procedures and process put in place by TMS to ensure that transport equipment is suitable for the cyanide shipment.

All Havouc Transport vehicles used to transport cyanide for TMS are subject to TMS' systems and procedures to ensure that equipment is designed and maintained to operate within the loads it will be handling.

All Havouc Transport vehicles used to transport cyanide for TMS are subject to TMS' procedures that verify the adequacy of the equipment for the load it must bear.

Havouc Transport operates according to the TMS procedures that are in place to prevent overloading of the transport vehicle being used for handling cyanide.

Skynight

Skynight operates under and is guided by the procedures and process put in place by TMS to ensure that transport equipment is suitable for the cyanide shipment.

All Skynight vehicles used to transport cyanide for TMS are subject to TMS' systems and procedures to ensure that equipment is designed and maintained to operate within the loads it will be handling.

All Skynight vehicles used to transport cyanide for TMS are subject to TMS' procedures that verify the adequacy of the equipment for the load it must bear.

Skynight operates according to the TMS procedures that are in place to prevent overloading of the transport vehicle being used for handling cyanide.

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2.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

	☒ **in full compliance with**	
The Supply Chain	☐ in substantial compliance with	**Transport Practice 1.4**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

TMS is in FULL COMPLIANCE with Transport Practice 1.4 requiring the development and implementation of a safety programme for the transport of cyanide.

TMS

TMS has handling and inspection procedures to ensure that cyanide is transported in a manner that maintains the integrity of the producer's packaging. TMS's involvement in maintaining the integrity of packaging is limited. Cyanide product is loaded and sealed by the producer and TMS has written procedures to check seals on all vessels and containers. The seals are substantial non-reusable locks, which are numbered. Seal numbers are recorded and cross checked at each point of the delivery chain through the delivery dockets and *Cyanide Drivers Trip Log*.

Delivery dockets are also carried on all vehicles. These documents are carried for each leg of the journey and they require the carrier and customer to sign that all seals have been checked and are intact and the material grade is detailed on the seals.

If any discrepancy is observed, TMS's operators report the issue and action is initiated depending on the circumstances including emergency response.

TMS uses placards or other signage to identify the shipment as cyanide, as required by local regulations and international standards. Vehicle placarding consists of the following:

- One EIP is placed on each of the long sides of the container, on diagonally opposite ends. This is done by cyanide manufactures.
- One EIP is placed on the vehicle so that it is visible from the rear. This is done by TMS.
- One Class 6 dangerous goods class label is placed at the front of the vehicle. This is done by TMS.

The TMS pre-departure checks include checks on placarding for the presence of dangerous goods diamonds, EIPs and dangerous goods labels.

TMS does implement a safety programme for cyanide transport that includes:

- Vehicle inspections prior to each departure/shipment.
- TMS has a *National Driver Work Diary Daily Sheet* that is completed by drivers before each trip. This check sheet covers both the prime mover and trailer and includes vehicle roadworthiness, dangerous goods requirements, PPE, communication equipment, etc.
- A preventive maintenance programme.

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- TMS vehicles involved in the transportation of cyanide are subject to an "ABC" maintenance scheme that includes checks on the structural integrity of the vehicles as well as Maintenance Management Accreditation Servicing as part of the NHVAS
- Limitations on operator or drivers' hours.
- TMS has a *Driver Hours and Fatigue Management* procedure and TMS uses the National Driver Work Diary Daily Sheet to track operator hours.
- Procedures to prevent loads from shifting.
- Isotainers and freight containers are secured using twist locks, which are designed and constructed to international transport standards. Twist locks are inspected prior to each departure and periodically during the journey.
- Procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered.
- TMS has a procedure for the Driver to contact base and await instructions.
- A drug abuse prevention programme.
- TGR has Drugs *and Alcohol Policy*, and a drug abuse prevention programme that consists of a formal policy and sampling programme.
- Retention of records documenting that the above activities have been conducted.

TMS does utilise subcontracted companies to transport cyanide. The transport companies are required to abide by TMS procedures including delivery procedures, training requirements and emergency response.

TGR undertake audits of subcontractors for compliance with TMS requirements.

KJP Haulage

KJP abide by TMS' systems and procedures for the safe transport of cyanide.

KJP Haulage are required to abide by TMS' procedures that have been implemented to maintain the integrity of the cyanide producer's packaging.

Placarding of cyanide shipments transported by KJP Haulage are in accordance with TMS systems.

KJP Haulage are required to abide by the following TMS safety programs:

- Vehicle inspections
- Preventative maintenance
- Limitations on driver hours
- Load shifting prevention
- Procedures for the suspension or modification of routes
- Drug abuse prevention.

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Havouc Transport

Havouc Transport abide by TMS' systems and procedures for the safe transport of cyanide.

Havouc Transport are required to abide by TMS' procedures that have been implemented to maintain the integrity of the cyanide producer's packaging.

Placarding of cyanide shipments transported by Havouc Transport are in accordance with TMS systems.

Havouc Transport are required to abide by the following TMS safety programs:

- Vehicle inspections
- Preventative maintenance
- Limitations on driver hours
- Load shifting prevention
- Procedures for the suspension or modification of routes
- Drug abuse prevention.

Skynight

Skynight abide by TMS' systems and procedures for the safe transport of cyanide.

Skynight are required to abide by TMS' procedures that have been implemented to maintain the integrity of the cyanide producer's packaging.

Placarding of cyanide shipments transported by Skynight are in accordance with TMS systems.

Skynight are required to abide by the following TMS safety programs:

- Vehicle inspections
- Preventative maintenance
- Limitations on driver hours
- Load shifting prevention
- Procedures for the suspension or modification of routes
- Drug abuse prevention.

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2.1.5 Transport Practice 1.5

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

	☒ **in full compliance with**	
The Supply Chain	☐ in substantial compliance with	**Transport Practice 1.5**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

TMS is in FULL COMPLIANCE with Transport Practice 1.5 requiring the operation to follow international standards for transportation of cyanide by sea and air.

TMS

TMS does not transport consignments of cyanide by sea or by air within the scope of this audit.

KJP Haulage

KJP Haulage does not transport consignments of cyanide by sea or by air within the scope of this audit.

Havouc Transport

Havouc Transport does not transport consignments of cyanide by sea or by air within the scope of this audit.

Skynight

Skynight does not transport consignments of cyanide by sea or by air within the scope of this audit.

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2.1.6 Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

	☒ **in full compliance with**	
The Supply Chain	☐ in substantial compliance with	**Transport Practice 1.6**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

TMS is in FULL COMPLIANCE with Transport Practice 1.6 requiring the tracking of cyanide shipments to prevent losses during transport.

TMS

TMS transport vehicles have means to communicate with the transport company, the mining operation, the cyanide producer or distributor, and/or emergency responders. All vehicles have comprehensive communications systems that include GPS tracking, mobile telephones, satellite telephones and UHF radios that are on for the duration of each trip. Trucks are also fitted with duress buttons.

Communication with consignees is by telephone and fax. Consignees are advised of dispatch time, estimated arrival time and extensive information on the container that was dispatched.

TMS periodically tests the communication equipment to ensure it functions properly. Satellite phones and UHF radios are checked prior to each delivery as part of the *Daily Operator Checksheet*. Testing of mobile phones and satellite tracking is through the continuous operation of the systems. TGR's Regional HSET Manager advised that duress buttons are tested every 3 months.

TMS ensure communication blackout areas along transport routes are identified and special procedures are implemented for within these blackout areas. This process is undertaken during the route assessment process. The occurrence of blackout areas is offset by the presence of satellite tracking and satellite phone systems installed within the trucks. In the event that a driver is unable to use the UHF radio or mobile phone to communicate with TMS, the satellite phone is used. For overnight deliveries, TMS establishes pre-set call in times with drivers prior to departure.

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

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

Inventory controls are the primary method of preventing product loss during shipment.

Shipping documents are included as part of every consignment. The documents indicate:

- Container numbers,
- Quantities and weights
- Seal numbers.

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MSDSs and an *Emergency Procedure Guide* are included within the driver's delivery folder. EPGs are prescribed by national transport laws.

Shipping records and emergency information were provided and were available on vehicles inspected.

TMS does utilise subcontracted companies to transport cyanide. The transport companies are required to abide by TMS procedures including delivery procedures training requirements and emergency response.

TGR undertake audits of subcontractors for compliance with TMS requirements.

KJP Haulage

KJP Haulage abide by TMS' systems and procedures for the tracking of cyanide to prevent losses during transport.

KJP Haualge vehicles have comprehensive communications systems that include GPS tracking, mobile telephones, satellite telephones and UHF radios that are on for the duration of each trip. Communication with consignees is by telephone and fax and coordinated by through TMS.

KJP Haulage's communication equipment is tested through processes established by TMS.

Communication blackout areas are managed as per processes established by TMS.

Cyanide transported by KJP Haulage is tracked as per processes established by TMS.

KJP Haulage have adopted TMS' inventory controls.

Shipping records, as described for TMS, are available during the transport of cyanide by KJP Haulage.

Havouc Transport

Havouc Transport abide by TMS' systems and procedures for the tracking of cyanide to prevent losses during transport.

Havouc Transport vehicles have comprehensive communications systems that include GPS tracking, mobile telephones, satellite telephones and UHF radios that are on for the duration of each trip. Communication with consignees is by telephone and fax and coordinated by through TMS.

Havouc Transport's communication equipment is tested through processes established by TMS.

Communication blackout areas are managed as per processes established by TMS.

Cyanide transported by Havouc Transport is tracked as per processes established by TMS.

Havouc Haulage have adopted TMS' inventory controls.

Shipping records, as described for TMS, are available during the transport of cyanide by Havouc Transport.

Skynight

Skynight abide by TMS' systems and procedures for the tracking of cyanide to prevent losses during transport.

Skynight vehicles have comprehensive communications systems that include GPS tracking, mobile telephones, satellite telephones and UHF radios that are on for the duration of each trip. Communication with consignees is by telephone and fax and coordinated by through TMS.

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Skynight's communication equipment is tested through processes established by TMS.

Communication blackout areas are managed as per processes established by TMS.

Cyanide transported by Skynight is tracked as per processes established by TMS.

Skynight have adopted TMS' inventory controls.

Shipping records, as described for TMS, are available during the transport of cyanide by Skynight.

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2.2 Principle 2 - Interim Storage

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

2.2.1 Transport Practice 2.1

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

	☒ **in full compliance with**	
The Supply Chain	☐ in substantial compliance with	**Transport Practice 2.1**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

TMS is in FULL COMPLIANCE with Transport Practice 2.1 requiring transporters design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures.

Within the scope of this audit, there are two trans-shipping depots or interim storage sites; TMS West Kalgoorlie Depot and TMS Dubbo Depot. Within the scope of this audit, at no time is cyanide product removed from the producers sealed containment or otherwise handled at either depot. An inspection of the TMS West Kalgoorlie depot and TCS Dubbo depot confirmed that warning signs are posted alerting workers that cyanide is present, smoking open flames eating and drinking are not allowed and what personal protective equipment must be worn.

At both TMS West Kalgoorlie and TMS Dubbo Depots security measures are in place to prevent unauthorised access to cyanide. These include full permitter security fencing to the facilities and the lock seals on the transport containers. An inspection of the facilities found the fencing, gates and locks to be in serviceable condition.

At both TMS West Kalgoorlie and TMS Dubbo Depots, cyanide is segregated from incompatible materials in accordance with Australian dangerous goods requirements. At no time is cyanide product removed from the producers sealed containment or otherwise handled thereby preventing mixing with other chemicals.

At both TMS West Kalgoorlie and TMS Dubbo Depots, cyanide is either store within IBCs within sealed freight containers or within specially designed isotainers. Both are designed to minimise the potential for contact of solid cyanide with water.

At both TMS West Kalgoorlie and TMS Dubbo Depots the freight containers and isotainers are sealed and stored in open areas within the depot that are naturally ventilated, preventing the build-up of hydrogen cyanide gas.

There are systems in place with the capacity to contain any spilled cyanide materials and minimise the extent of a release. The design and construction of the isotainers and IBCs will minimise the extent of release and these containers are stored within designated bunded areas at TMS West Kalgoorlie Depot. At TMS Dubbo Depot the site is sealed and it drains to a designated sealed catchment area that has capacity to contain spilled cyanide materials and minimise the extent of a release.

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Due Diligences – Rail Terminals and Sidings

Aurizon West Kalgoorlie Rail Terminal

TMS conducted a due diligence of the Aurizon West Kalgoorlie Rail Terminal on 13 May 2013. The assessment noted that the facility is fully fenced, gated and locked after hours. Visitors are required to sign in and out of the facility and must be escorted at all times whilst within the confines of the terminal facility.

The terminal has a separated and bunded facility dedicated for inbound cyanide. All products are in transit only, however, the terminal has a 325 T licence for interim storage of Class 6.1 products due to quantities that are transited through the terminal facility. Segregation/separation within the terminal facility is in accordance with ADG Code requirements.

Appropriate warning signage is in place. The terminal facility has a no smoking on the hardstand policy, which is enforced. Eating and drinking facilities are provided for facility personnel.

Dangerous goods training is provided by Aurizon to its employees, but this is not cyanide specific. Cyanide awareness has been provided by AGR. Orica cyanide awareness information is available at the site. Training records are maintained by Aurizon.

There is an existing emergency response plan in place, which was last updated on 14 June 2012. The last cyanide emergency mock drill was held in July 2012 and involved the local emergency response agencies.

In event of a spill, drains are able to be blocked to prevent egress from the facility into any surrounding waterways. An emergency bund is available at the terminal facility for placement of leaking containers into should the need arise. A spill kit is located in a readily accessible area if required.

The assessment found that the facility meets TMS' operational requirements

Aurizon Mount Isa Rail Container Terminal

TMS conducted a due diligence of the Aurizon Mount Isa Rail Container Terminal on 28 May 2013. The assessment noted that the facility is fully fenced, gated and locked after hours. Visitors are required to sign in and out of the facility and must be escorted at all times whilst within the confines of the terminal facility.

There is no separate area for the storage of dangerous goods as the facility is used for transit only.

Terminal facility emergency response plan was recently tested for a product other than cyanide in 2012.

In event of a spill, drains are able to be blocked to prevent egress from the facility into any surrounding waterways. An emergency bund is available at the terminal facility for placement of leaking containers into should the need arise. A spill kit is located in a readily accessible area if required.

The assessment found that the facility meets TMS' operational requirements

Aurizon Mount Miller Dangerous Goods and Industrial Siding

TMS conducted a due diligence of the Aurizon Mt Miller Dangerous Goods and Industrial Siding on 23 April 2013. The assessment noted the terminal facility is fully fenced, gated and locked after hours. Visitors are required to sign in and out of the facility and must be escorted at all times whilst within the confines of the terminal facility.

There is no separate area for the storage of dangerous goods as the facility is used for transit only.

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Hazardous chemical signage and MSDSs are in place and the facility is a non-smoking facility.

The facility has an emergency response plan in place. Dangerous goods training is provided by Aurizon and external providers to facility personnel. Cyanide safety awareness information has been provided by Orica previously. Emergency response training is appropriate for all products handled at the site not just cyanide. Training records are maintained by Aurizon.

A windsock is in place to indicate wind direction.

In event of a spill, drains are able to be blocked to prevent egress from the facility into any surrounding waterways. An emergency bund is available at the terminal facility for placement of leaking containers into should the need arise. A spill kit is located in a readily accessible area if required.

The assessment found that the facility meets TMS' operational requirements

Aurizon Acacia Ridge Rail Terminal

TMS conducted a due diligence of the Aurizon Acacia Ridge Rail Terminal on 12 September 2013.
The assessment noted that the facility is fully fenced with security monitoring systems in place. It is manned 24 hours each day and all gates are locked after hours.

No dangerous goods are held on the ground at the standard gauge container terminal overnight.
The wagons, when stored in transit, are held in dedicated rows at the narrow gauge rail yard until the transfer shunt.

The facility has an emergency response plan in place and training is provided as per the Aurizon emergency response plan to relevant personnel. Spill kits are provided by Aurizon. In the event of a Cyanide Spill the Product Specialist would be engaged along with the Queensland Fire and Rescue Service for appropriate spill containment.

The assessment found that the facility meets TMS' operational requirements.

Aurizon Dynon Melbourne, Rail Terminal

TMS conducted a due diligence of the Aurizon Dynon Rail Terminal on 7 June 2013. The assessment noted that the facility is fenced and gates are locked after hours. There is also CCTV and security surveillance from Victrack and Qube. Security patrols are also utilised to conduct regular security checks.

Dangerous goods are segregated as per Aurizon and rail authority legislative requirements. Containers are not stored on site but are left on rail wagon for trans-shipment and in transit storage only.

Appropriate facility warning signage is in place and EIPs were observed. Consignment paperwork is viewed when loads are booked and forklift operators have access to the booking system and can identify the correct container prior to lifting.

The terminal facility has a no smoking policy (excluding designated areas).

An emergency response plan is in place and was tested in February 2013.

An emergency bund is available at the terminal facility for placement of leaking containers into should the need arise.

The assessment found that the facility meets TMS' operational requirements.

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Qube Logistics Port Botany Container Park Rail Terminal

TMS conducted a due diligence of the Qube Port Botany Container Park on 21 May 2013. The assessment noted that the facility is fully fenced and secured. The facility is operational 24 hours and has manned security at the entrance points. Visitors are required to sign in and out of the facility and must be escorted at all times whilst within the confines of the terminal facility.

Staff understand segregation requirements. Appropriate hazchem signage in place, and the visitor escort process is strictly adhered to. The terminal facility has a non-smoking policy and there are no signage for restrictions on eating or drinking.

An emergency response plan is in place. In event of a spill, drains are able to be blocked to prevent egress from the facility into any surrounding waterways. A bund is available at the terminal facility for placement of leaking containers into should the need arise.

A spill kit is located in a readily accessible area if required by technical specialists.

A windsock is in place to indicate wind direction.

The assessment found that the facility meets TMS' operational requirements

Pacific National Chullora Rail Terminal

TMS conducted a due diligence of the Pacific National Chullora Rail Terminal on 21 May 2013.
The assessment noted the terminal facility is fully fenced and locked after hours. Visitors are required to sign in and out of the facility and must be escorted at all times whilst within the confines of the terminal facility.

Segregation/separation of materials in accordance with Australia dangerous goods requirements is in effect.

Appropriate warning signage is in place. Container Emergency Information Panels are an integral element of this signage regime.

The terminal facility has a no smoking on the hardstand policy, which is enforced. Eating and drinking facilities are provided for facility personnel.

An emergency response plan exists for the facility and it is tested annually.

In event of a spill, drains are able to be blocked to prevent egress from the facility into any surrounding waterways. A spill kit is located in a readily accessible area if required.

An emergency bund is available at the terminal facility for placement of leaking containers into should the need arise.

The assessment found that the facility meets TMS' operational requirements.

Fletchers International Exports Rail Terminal

TMS conducted a due diligence of the Fletchers Rail Terminal on 22 May 2013. The assessment noted the facility is fenced, gated and monitored by security personnel located at a gatehouse approximately two kilometres up the road.

The terminal facility does not have a dedicated area for dangerous goods and the site is not authorised to store the product.

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Workshop facilities are available and equipment is serviced to exceed the manufacturer's requirements. An external provider conducts the servicing on the premises.

All containers are inspected on receipt at the facility and as an integral facet of the train safety-walk through prior to departure.

Cyanide signage is not present as the site is not used for the storage of cyanide. PPE requirements are signposted.

The facility is a non-smoking facility.

The facility has an emergency response plant, dated 2012, which was last tested in 2012.

The assessment found that the facility meets TMS' operational requirements.

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2.3 Principle 3 - Emergency Response

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

2.3.1 Transport Practice 3.1

Prepare detailed Emergency Response Plans for potential cyanide releases.

	☒ **in full compliance with**	
The Supply Chain	☐ in substantial compliance with	**Transport Practice 3.1**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

TMS is in FULL COMPLIANCE with Transport Practice 3.1 requiring the operation prepare detailed Emergency Response Plans for potential cyanide releases.

TMS

The management of cyanide related emergencies is an integrated approach with the assistance of the cyanide producers (Orica and AGR). TMS's CTMP and *Transport Emergency Response Plan* (TERP) detail the interface and responsibilities of TMS and the producer.

The TERP is the emergency response document that will be used in the case of a cyanide related incident. The TERP breaks down transport emergencies into the following categories:

- Vehicle Breakdown
- Minor vehicle incident
- Major vehicle incident.

TMS also has a *Subcontractor and Driver's TERP*, which provides information for subcontractors to respond to a transport emergency.

The TERP is appropriate for the selected transportation route or interim storage facility. The TERP covers all transport movements controlled by TMS. The TERP requires notification of Emergency Services, TMS Operations Manager and the cyanide producer's ERS in the event of a cyanide emergency during transport.

The drivers have a copy of the *Subcontractors and Driver's TERP* and also ISS First Response which is a 24 hour emergency contact centre that relays information to TGR's Management, cyanide producers ERS and Emergency Services as needed.

TMS access the resources of the respective producer for cyanide related incidents. Both producers approach off site release as a shared responsibility and transporters have access to both producers' 24 hour emergency call centres.

The TERP does consider both the physical and chemical form of cyanide. The TERP prompts the activation of the producers ERS and thus addresses both the chemical and physical forms of cyanide. The TERP also includes the MSDS which provides information on the physical and chemical form of cyanide and the associate hazards and response actions.

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TMS operates the road component of the supply chain, with rail transport covered by due diligences. The plans are based around the road transportation of isocontainers and freight containers. TMS has the responsibility for notification and initial isolation of the scene in the event of a cyanide transport incident.

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

The TERP does consider the design of the transport vehicle. TMS has the responsibility for notification and initial isolation of the scene in the event of a cyanide transport incident.

The TERP include descriptions of response actions, as appropriate for the anticipated emergency situation.

The TERP provides responsibilities for:

- Drivers
- Subcontractors
- Operations Manager
- Incident Responder
- Incident Coordinator
- TMS Managers
- TMS General Manager
- National HSE Manager.

The critical component of the emergency response process is the producer's ERS systems that operates 24 hours a day, seven days a week providing telephone advice and assistance to the public, Emergency Services and others on incidents relating to the transport, storage and use of chemical products and raw materials in emergency situations.

The vehicle drivers have a tailored version of the TERP (*Subcontractors and Driver's TERP)* that describes the actions to be taken in an emergency. Drivers have a notification role and a scene isolation and control role as far as circumstances allow.

The TERP details the roles of outside responders, primarily that of producer ERS service. The TERP does recognise the role and responsibilities of government emergency response agencies and that control of an incident initially will be assumed by these agencies until satisfied that public safety is no longer a concern.

The TERP states that the driver should ring the emergency services number if necessary and advise of the dangerous goods involved. The contact that follows is the Operations Manager and the TGR ERS (ISS). The incident coordinator then notifies appropriate statutory authorities.

All cyanide products in Australia contain an EIP listing Emergency Services number (i.e. Police, Ambulance and Fire Brigade) and the producers ERS contact number. The Emergency Services number (000) is always listed as a first point of contact. The producers ERS is for technical advice in the event of an emergency.

TMS has engaged emergency management firm to provide emergency monitoring and notification services.

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KJP Haulage

KJP Haulage operates under TMS's emergency response processes and procedures.

KJP Haulage follow TMS' *Subcontractor and Driver's TERP,* which provides information for subcontractors to respond to a transport emergency. It states that in a major incident, a representative of TMS must attend the scene.

The *Subcontractors and Driver's TERP*, produced by TMS, is appropriate for KJP Haulage transportation routes as it is a compendium to the overarching TMS TERP, which covers all transport movements controlled by TMS.

The TMS TERP, which KJP Haulage operate under, considers both the physical and chemical form of cyanide.

The TMS TERP, which KJP Haulage operate under, considers the method of transport (i.e. road).

The TMS TERP, which KJP Haulage operate under, considers all aspects of the transport infrastructure.

The TMS TERP, which KJP Haulage operate under, considers the design of the transport vehicle.

KJP Haulage drivers have a tailored version of TMS' TERP (*Subcontractors and Driver's TERP)* that describes the actions to be taken in an emergency. Drivers have a notification role and a scene isolation and control role as far as circumstances allow.

The roles of outside stakeholders during transport of cyanide undertaken by KJP Haulage are identified in TMS' emergency procedures.

Havouc Transport

Havouc Transport operates under TMS's emergency response processes and procedures.

Havouc Transport follow TMS' *Subcontractor and Driver's TERP,* which provides information for subcontractors to respond to a transport emergency. It states that in a major incident, a representative of TMS must attend the scene.

The *Subcontractors and Driver's TERP*, produced by TMS, is appropriate for Havouc Transport transportation routes as it is a compendium to the overarching TMS TERP, which covers all transport movements controlled by TMS.

The TMS TERP, which Havouc Transport operate under, considers both the physical and chemical form of cyanide.

The TMS TERP, which Havouc Transport operate under, considers the method of transport (i.e. road).

The TMS TERP, which operate under, considers all aspects of the transport infrastructure.

The TMS TERP, which Havouc Transport operate under, considers the design of the transport vehicle.

Havouc Transport drivers have a tailored version of TMS' TERP (*Subcontractors and Driver's TERP)* that describes the actions to be taken in an emergency. Drivers have a notification role and a scene isolation and control role as far as circumstances allow.

The roles of outside stakeholders during transport of cyanide undertaken by Havouc Transport are identified in TMS' emergency procedures.

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Skynight

Skynight operates under TMS's emergency response processes and procedures.

Skynight follow TMS' *Subcontractor and Driver's TERP,* which provides information for subcontractors to respond to a transport emergency. It states that in a major incident, a representative of TMS must attend the scene.

The *Subcontractors and Driver's TERP*, produced by TMS, is appropriate for Skynight transportation routes as it is a compendium to the overarching TMS TERP, which covers all transport movements controlled by TMS.

The TMS TERP, which Skynight operate under, considers both the physical and chemical form of cyanide.

The TMS TERP, which Skynight operate under, considers the method of transport (i.e. road).

The TMS TERP, which Skynight operate under, considers all aspects of the transport infrastructure.

The TMS TERP, which Skynight operate under, considers the design of the transport vehicle.

Skynight drivers have a tailored version of TMS' TERP (*Subcontractors and Driver's TERP)* that describes the actions to be taken in an emergency. Drivers have a notification role and a scene isolation and control role as far as circumstances allow.

The roles of outside stakeholders during transport of cyanide undertaken by Skynight are identified in TMS' emergency procedures.

Due Diligences – Rail Operators

Aurizon

TMS conducted compiled a due diligence of Aurizon on 11 April 2013. The assessment noted Aurizon has emergency response plans in place for all sites inspected which are suitable for the product carried and type of operation.

The assessment found that Aurizon meets TMS' operational requirements

Pacific National

TMS conducted compiled a due diligence of Pacific National on 11 April 2013. The assessment noted Pacific National has emergency response plans in place for all sites inspected which are suitable for the product carried and type of operation.

The assessment found that Aurizon meets TMS' operational requirements.

Fletchers International Exports

TMS conducted compiled a due diligence of Fletchers on 22 May 2013. The assessment noted that Fletchers has an emergency response plan that was tested in 2012 and is due for testing in 2013. Training has been provided to employees. Cyanide Awareness training has been provided.

The assessment found that Fletchers meets TMS' operational requirements.

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Due Diligences – Rail Terminals and Sidings

Aurizon West Kalgoorlie Rail Terminal

TMS conducted a due diligence of the Aurizon West Kalgoorlie Rail Terminal on 13 May 2013. The assessment noted that the terminal has an emergency response plan in place, which was last updated on 14 June 2012. The last cyanide emergency mock drill was held in July 2012 and involved the local emergency response agencies.

In event of a spill, drains are able to be blocked to prevent egress from the facility into any surrounding waterways. An emergency bund is available at the terminal facility for placement of leaking containers into should the need arise. A spill kit is located in a readily accessible area if required.

The assessment found that the facility meets TMS' operational requirements

Aurizon Mount Isa Rail Container Terminal

TMS conducted a due diligence of the Aurizon Mount Isa Rail Container Terminal on 28 May 2013. The assessment noted the facility has an emergency response plan and that it was recently tested for a product other than cyanide in 2012.

In event of a spill, drains are able to be blocked to prevent egress from the facility into any surrounding waterways. An emergency bund is available at the terminal facility for placement of leaking containers into should the need arise. A spill kit is located in a readily accessible area if required.

The assessment found that the facility meets TMS' operational requirements.

Aurizon Mount Miller Dangerous Goods and Industrial Siding

TMS conducted a due diligence of the Aurizon Mt Miller Dangerous Goods and Industrial Siding on 23 April 2013. The assessment noted the facility has an emergency response plan in place. A mock emergency drill was last conducted during the last year; however documentary evidence was not available at the time of the due diligence.

In event of a spill, drains are able to be blocked to prevent egress from the facility into any surrounding waterways. An emergency bund is available at the terminal facility for placement of leaking containers into should the need arise. A spill kit is located in a readily accessible area if required.

The assessment found that the facility meets TMS' operational requirements.

Aurizon Acacia Ridge Rail Terminal

TMS conducted a due diligence of the Aurizon Acacia Ridge Rail Terminal on 12 September 2013. The assessment noted that the facility has an emergency response plan in place and training is provided as per the Aurizon emergency response plan to relevant personnel. Spill kits are provided by Aurizon. In the event of a Cyanide Spill the Product Specialist would be engaged along with the Queensland Fire and Rescue Service for appropriate spill containment

The assessment found that the facility meets TMS' operational requirements

Aurizon Dynon Melbourne, Rail Terminal

TMS conducted a due diligence of the Aurizon Dynon Rail Terminal on 7 June 2013. The assessment noted that an emergency response plan is in place and was tested in February 2013. Facility staff are trained in dangerous goods and the emergency response plan. In addition, Orica's cyanide awareness training is given. An emergency bund is available at the terminal facility for placement of leaking containers into should the need arise.

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The assessment found that the facility meets TMS' operational requirements

Qube Logistics Port Botany Container Park Rail Terminal

TMS conducted a due diligence of the Qube Port Botany Container Park on 21 May 2013. The assessment noted that an emergency response plan is in place. Facility staff are trained in dangerous goods and the emergency response plan.

An emergency bund is available at the terminal facility for placement of leaking containers into should the need arise.

The assessment found that the facility meets TMS' operational requirements.

Pacific National Chullora Rail Terminal

TMS conducted a due diligence of the Pacific National Chullora Rail Terminal on 21 May 2013. The assessment noted that an emergency response plan exists for the facility and it is tested annually.

In event of a spill, drains are able to be blocked to prevent egress from the facility into any surrounding waterways. A spill kit is located in a readily accessible area if required.

An emergency bund is available at the terminal facility for placement of leaking containers into should the need arise.

The assessment found that the facility meets TMS' operational requirements.

Fletchers International Exports Rail Terminal

TMS conducted a due diligence of the Fletchers Rail Terminal on 22 May 2013. The assessment noted the facility has an emergency response plant, dated 2012, which was last tested in 2012.

The terminal facility does not have a dedicated area for dangerous goods and the site is not authorised to store the product. Storage if required is done at the TMS Dubbo Depot.

The assessment found that the facility meets TMS' operational requirements.

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2.3.2 Transport Practice 3.2

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

	☒ **in full compliance with**	
The Supply Chain	☐ in substantial compliance with	**Transport Practice 3.2**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

TMS is in FULL COMPLIANCE with Transport Practice 3.2 requiring they designate appropriate response personnel and commit necessary resources for emergency response.

TMS

TMS does provide training to appropriate response personnel to fulfil the duties outlines in the TERP. The TMS *Training and Development* procedure requires personnel to be appropriately qualified and trained to perform their appointed tasks effectively and safely. The CTMP states that all training should be competency based and comply with all applicable TMS training standards. The CTMP details the minimum training requirements for those involved in the transportation of cyanide.

TMS coordinates field and desktop exercises in consultation with cyanide manufactures on a regular basis. All transport subcontractors will participate in or review these exercises as required.

TMS personnel do not undertake cyanide remediation or containment duties, unless it is at the direction of cyanide manufactures.

New drivers, employees and subcontractors receive emergency response training as part of the induction process.

TMS has a database that stores all training records of employees, with expiry dates noted where relevant.

The TERP does identify the specific emergency response duties and responsibilities of TMS personnel for response in the event of an incident. This includes drivers, supervisors, incident responders and managers.

The TERP lists the following general items for incident responders in a major incident. In the event of a cyanide emergency, the TERP defaults to Orica's *Emergency Response Guide*. This guide lists the required emergency response PPE. A *Cyanide Driver Checklist* also lists the emergency response equipment that is required to be carried. This checklist is used by the TMS drivers prior to departure.

TMS does have the necessary emergency response and health and safety equipment, including personal protective equipment available during transport.

TMS provide initial induction training on cyanide awareness and emergency response procedures for drivers and subcontractor drivers. The TERP requires regular exercises to be carried out with the National HSE Manager having responsibility for ensuring emergency exercises are carried out and involve all personnel and Emergency Services, where appropriate. TMS has a HSE Management plan that outlines when exercises are to be held and schedules refresher training for emergency procedures.

TMS uses a *Cyanide Driver Checklist* to ensure that all required emergency equipment is available on each vehicle. Drivers are required to complete the checklist prior to departure.

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TMS provide initial induction training on cyanide awareness and emergency response procedures for drivers and subcontractor drivers and records are maintained in the vault database system.

The TERP requires regular exercises to be carried out with the National HSE Manager having responsibility for ensuring emergency exercises are carried out and involve all personnel and Emergency Services, where appropriate.

TMS do have procedures to check emergency response equipment. TMS implement a *Cyanide Driver Checklist* that the driver completes prior to departure. This checklist includes a check on emergency response equipment.

TMS also undertake vehicle audits that checks the driver has the correct PPE and understands that hazards of cross contamination of different dangerous goods.

TMS does utilise subcontracted companies to transport cyanide. The transport companies are required to abide by TMS procedures including delivery procedures training requirements and emergency response. TMS has also engaged Car-Trek Australia Pty Ltd (ISS First Response) to provide emergency monitoring and notification services.

TGR undertake audits of subcontractors for compliance with TMS requirements.

KJP Haulage

KJP Haulage abide by TMS' systems and procedures to ensure that appropriate personnel and equipment are designated to and available for emergency response. In the event of an emergency, KJP Haulage drivers have a notification role and a scene isolation and control role as far as circumstances allow.

KJP Haulage drivers must meet TMS training, qualification and licensing requirements prior to transporting cyanide, which includes training in emergency response procedures. The TMS training matrix includes KJP Haulage drivers.

Descriptions of roles and responsibilities for KJP Haualge drivers in the event of an emergency are described within TMS' *Subcontractor and Drivers TERP.*

Emergency response equipment available to KJP Haulage drivers in the event of an emergency is listed in the TMS documentation described above.

KJP Haulage has implemented TMS' *Cyanide Driver Checklist*, which drivers must complete prior to departure. This checklist includes a check on emergency response equipment. Completed checklists were viewed by the Auditor.

TMS' TERP requires that regular emergency exercises are carried out involving TMS and subcontractor drivers. This training covers all roles and responsibilities for emergency response. Records of completed training for KJP Haulage drivers were viewed from 2011 to 2013.

Havouc Transport

Havouc Transport abide by TMS' systems and procedures to ensure that appropriate personnel and equipment are designated to and available for emergency response. In the event of an emergency, Havouc Transport drivers have a notification and a scene isolation and control role as far as circumstances allow.

Havouc Transport drivers must meet TMS training, qualification and licensing requirements prior to transporting cyanide, which includes training in emergency response procedures. The TMS training matrix includes Havouc Transport drivers.

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Descriptions of roles and responsibilities for Havouc Transport drivers in the event of an emergency are described within TMS' *Subcontractor and Drivers TERP.*

Emergency response equipment available to Havouc Transport drivers in the event of an emergency is listed in the TMS documentation described above.

Havaouc Transport has implemented TMS' *Cyanide Driver Checklist*, which drivers must complete prior to departure. This checklist includes a check on emergency response equipment. Completed checklists were viewed by the Auditor.

TMS' TERP requires that regular emergency exercises are carried out involving TMS and subcontractor drivers. This training covers all roles and responsibilities for emergency response. Records of completed training for Havouc Haulage drivers were viewed from 2011 to 2013.

Skynight

Skynight abide by TMS' systems and procedures to ensure that appropriate personnel and equipment are designated to and available for emergency response. In the event of an emergency, Skynight drivers have a notification and a scene isolation and control role as far as circumstances allow.

Skynight drivers must meet TMS training, qualification and licensing requirements prior to transporting cyanide, which includes training in emergency response procedures. The TMS training matrix includes Skynight drivers.

Descriptions of roles and responsibilities for Skynight drivers in the event of an emergency are described within TMS' *Subcontractor and Drivers TERP.*

Emergency response equipment available to Skynight drivers in the event of an emergency is listed in the TMS documentation described above.

Skynight has implemented TMS' *Cyanide Driver Checklist*, which drivers must complete prior to departure. This checklist includes a check on emergency response equipment. Completed checklists were viewed by the Auditor.

TMS' TERP requires that regular emergency exercises are carried out involving TMS and subcontractor drivers. This training covers all roles and responsibilities for emergency response. Records of completed training for Skynight drivers were viewed from 2011 to 2013.

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2.3.3 Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

	☒ **in full compliance with**	
The Supply Chain	☐ in substantial compliance with	**Transport Practice 3.3**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

TMS is in FULL COMPLIANCE with Transport Practice 3.3 requiring that they develop procedures for internal and external emergency notification and reporting.

TMS

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

The TERP requires notification of Emergency Services and the cyanide manufacture's ERS service in the event of a cyanide emergency during transport. The drivers have a copy of the *Subcontractor and Driver's TERP*. In addition, the drivers have the number for ISS First Response, which is a 24 hour emergency contact centre that relays information to TGR Management, cyanide manufacture's ERS services and Emergency Services as needed.

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

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

The TERP is a controlled document subject to an annual review and at the time of the audit was at Revision 13, 26 August 2013. This review includes contact information. The TERP is also reviewed after any deficiencies identified in during exercises or incidents and whenever a significant change is made to operations. TMS also has a standalone list of emergency contacts which is on Revision 15, dated 19 March 2013.

KJP Haulage

KJP Haulage abide by TMS' systems and procedures for internal and external emergency notification. All documentation used has been developed and is maintained by TMS. All communications with external stakeholders (excluding emergency responders) during transport operations by KJP Haulage is through TMS.

Notification and reporting procedures for KJP Haulage are contained within TMS' *Subcontractor and Drivers TERP*. This procedure is maintained by TMS and provided to KJP Haulage.

Havouc Transport

Havouc Transport abide by TMS' systems and procedures for internal and external emergency notification. All documentation used has been developed and is maintained by TMS.

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All communications with external stakeholders (excluding emergency responders) during transport operations by is through TMS.

Notification and reporting procedures for Havouc Transport are contained within TMS' *Subcontractor and Drivers TERP*. This procedure is maintained by TMS and provided to Havouc Transport.

Skynight

Skynight abide by TMS' systems and procedures for internal and external emergency notification. All documentation used has been developed and is maintained by TMS.

All communications with external stakeholders (excluding emergency responders) during transport operations by Skynight is through TMS.

Notification and reporting procedures for Skynight are contained within TMS' *Subcontractor and Drivers TERP*. This procedure is maintained by TMS and provided to Skynight.

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2.3.4 Transport Practice 3.4

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

	☒ **in full compliance with**	
The Supply Chain	☐ in substantial compliance with	**Transport Practice 3.4**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

TMS is in FULL COMPLIANCE with Transport Practice 3.4, requiring the operation to develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

TMS

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

TMS defer to the Orica *Emergency Response Guide – Sodium Cyanide* for remediation, treatment or recovery. Section 3.6 *(Sodium Cyanide Spill in a Waterway)* of the *Emergency Response Guide – Sodium Cyanide* notes at the start of the procedure that:

> *… no chemicals are to be added to a flowing waterway in the event of a cyanide spill as these may only exacerbate the situation with their own toxicity characteristics.*

KJP Haulage

As stated in the *Subcontractor and Drivers TERP*, the role of KJP Haulage drivers is notification and scene isolation/control. Remediation is undertaken by Toll, Orica and emergency services. Remediation procedures are contained within TMS TERP and Orica *Emergency Response Guide - Sodium Cyanide*.

Havouc Transport

As stated in the *Subcontractor and Drivers TERP*, the role of Havouc Transport drivers is notification and scene isolation/control. Remediation is undertaken by Toll, Orica and emergency services. Remediation procedures are contained within TMS TERP and Orica *Emergency Response Guide - Sodium Cyanide*.

Skynight

As stated in the *Subcontractor and Drivers TERP*, the role of Skynight drivers is notification and scene isolation/control. Remediation is undertaken by Toll, Orica and emergency services. Remediation procedures are contained within TMS TERP and Orica *Emergency Response Guide - Sodium Cyanide*.

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2.3.5 Transport Practice 3.5

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

	☒ **in full compliance with**	
The Supply Chain	☐ in substantial compliance with	**Transport Practice 3.5**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

TMS is in FULL COMPLIANCE with Transport Practice 3.5, requiring the operation to periodically evaluate response procedures and capabilities and revise them as needed.

The TERP contains provisions for periodically reviewing and evaluating the plan's adequacy and they are being implemented. Section 12.4 of the TERP requires it to be reviewed:

- At least annually
- After any deficiencies are identified during exercises or incidents
- Whenever a significant change is made to the operations (e.g. change to key personnel, suppliers, equipment, products, routes etc.).

The plan requires small scale exercises every six months; it notes that these small scale exercises, where possible, will be practical exercises. A major incident desktop exercise is required annually and should include external services (fire and rescue, ISS and customer representatives).

TMS conducted a mock exercise at the ARG Rail Terminal in Kalgoorlie in November 2012. The exercise involved the possible leakage of cyanide solid causing environmental contamination. The following parties participated in this exercise:

- TMS
- Orica
- External Parties – Fire and Emergency Services Australia, ISS First Response.

TMS produced a report that included an assessment summary and positive outcomes. This report was sent to appropriate people at TMS, Orica and regulatory authorities. TMS also conducted a field exercise at Rockhampton in July 2011 and Gladstone in November 2011.

KJP Haulage

KJP Haulage follow response procedures developed and maintained by TMS. As such, the evaluation and revision of such procedures is controlled by TMS.

The TMS TERP contains provisions for periodically conducting mock emergency drills. KJP Haulage participate in these drills at the request of TMS. The last TMS drill that KJP Haulage participated in was in November 2011.

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Havouc Transport

Havouc Transport follow response procedures developed and maintained by TMS. As such, the evaluation and revision of such procedures is controlled by TMS.

The TMS TERP contains provisions for periodically conducting mock emergency drills. Havouc Transport participate in these drills at the request of TMS. The last TMS drill that Havouc Transport participated in was in November 2011.

Skynight

Skynight follow response procedures developed and maintained by TMS. As such, the evaluation and revision of such procedures is controlled by TMS.

The TMS TERP contains provisions for periodically conducting mock emergency drills. Skynight participate in these drills at the request of TMS.

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3.0 DUE DILIGENCE

TMS' due diligence process and findings for rail operators and rail terminals and sidings used as part of the Toll Mining Services Australian Supply Chain are summarised in the following sections. These have been reviewed by Ed Clerk of Golder. Ed is pre-certified by the ICMI as a Transport Technical Specialist.

3.1 Rail Operators

3.1.1 Aurizon

TMS conducted compiled a due diligence of Aurizon on 11 April 2013. The due diligence was based on an accumulation of data from multiple site visits at multiple Aurizon locations. The due diligence was conducted by Sheena Ward, Regional HSET Manager, Toll Global Resources.

The following items were addressed within the due diligence:

- Facility Description
- General Data
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Although emergency response was not specifically addressed within a separate section, it was discussed satisfactorily within the Due Diligence.

The due diligence review was compiled through physical visits, interviews and discussions with appropriate personnel, internet information and review of applicable documentation.

The due diligence concluded that:

> *Based upon the information obtained in this due diligence assessment, this company does meet Toll Mining Services requirements.*

3.1.2 Pacific National

TMS conducted compiled a due diligence of Pacific National on 11 April 2014. The due diligence was based on an accumulation of data from multiple site visits. The due diligence was conducted by Sheena Ward, Regional HSET Manager, Toll Global Resources.

The following items were addressed within the due diligence:

- Facility Description
- General Data
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Although emergency response was not specifically addressed within a separate section, it was discussed satisfactorily within the due diligence.

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The due diligence review was compiled through physical visits, interviews and discussions with appropriate personnel, and review of applicable documentation.

The due diligence concluded that:

> *Based upon the information obtained in this due diligence assessment, this company does meet Toll Mining Services requirements.*

3.1.3 Fletchers International Exports

TMS conducted compiled a due diligence of Fletchers on 22 May 2013. The due diligence was based on an accumulation of data from multiple site visits. The due diligence was conducted by Sheena Ward, Regional HSET Manager, Toll Global Resources. The due diligence reviewed combined both the rail operator and the Fletchers Rail Terminal as TMS use only a single rail terminal and rail line within its Australian Supply Chain. TMS has the same Fletchers' contact for both the rail terminal and rail operator.

The following items were addressed within the due diligence:

- Facility Description
- General Data
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Although emergency response was not specifically addressed within a separate section, it was discussed satisfactorily within the Due Diligence.

The due diligence review was compiled through physical visits, interviews and discussions with appropriate personnel, and review of applicable documentation.

The due diligence concluded that:

> *Based upon the information obtained in this due diligence assessment, this facility does meet Toll Mining Services requirements.*

3.2 Rail Terminals and Sidings

3.2.1 Aurizon West Kalgoorlie Rail Terminal

TMS conducted a due diligence of the Aurizon West Kalgoorlie Rail Terminal on 13 May 2013. The due diligence was conducted by Sheena Ward, Regional HSET Manager, Toll Global Resources.

The following items were addressed within the due diligence:

- Facility Description
- General Data
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

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Although emergency response was not specifically addressed within a separate section, it was discussed satisfactorily within the Due Diligence.

The due diligence review was compiled through physical visits, interviews and discussions with appropriate personnel and review of applicable documentation.

The due diligence concluded that:

> *Based upon the information obtained in this due diligence assessment, this facility does meet Toll Mining Services requirements.*

3.2.2 Aurizon Mount Isa Rail Container Terminal

TMS conducted a due diligence of the Aurizon Mount Isa Rail Container Terminal on 28 May 2013. The due diligence was conducted by Sheena Ward, Regional HSET Manager, Toll Global Resources.

The following items were addressed within the due diligence:

- Facility Description
- General Data
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Although emergency response was not specifically addressed within a separate section, it was discussed satisfactorily within the Due Diligence.

The due diligence review was compiled through physical visits, interviews and discussions with appropriate personnel and review of applicable documentation.

The due diligence concluded that:

> *Based upon the information obtained in this due diligence assessment, this facility does meet Toll Mining Services requirements.*

3.2.3 Aurizon Mount Miller Dangerous Goods and Industrial Siding

TMS conducted a due diligence of the Aurizon Mt Miller Dangerous Goods and Industrial Siding on 23 April 2013. The due diligence was conducted by Robert Orbell, TGR Operations Supervisor Sheena Ward TGR Regional HSET Manager.

The following items were addressed within the due diligence:

- Facility Description
- General Data
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

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Emergency response was addressed within the *Additional Information* section of the Due Diligence.

The due diligence was compiled through physical visits, interviews with appropriate personnel and a review of relevant documentation.

The due diligence concluded the Mount Miller Rail Facility is well managed and that:

> *Based upon the information obtained in this due diligence assessment, this facility does meet Toll Mining Services requirements.*

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3.2.4 Aurizon Acacia Ridge Rail Terminal

TMS conducted a due diligence of the Aurizon Acacia Ridge Rail Terminal on 12 September 2013. The due diligence was conducted by Sheena Ward, Regional HSET Manager, Toll Global Resources.

The following items were addressed within the due diligence:

- Facility Description
- General Data
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Emergency response was addressed within the *Additional Information* section of the Due Diligence.

The due diligence was compiled through physical visits, interviews and discussions with appropriate personnel.

The due diligence concluded that:

> *The Acacia Ridge Facility is secured and well managed in accordance with the requirements for Cyanide and Dangerous Goods. The systems and processes are well managed. Based upon the information obtained in this due diligence assessment, this facility does meet Toll Mining Services' requirements.*

3.2.5 Aurizon Dynon Melbourne Rail Terminal

TMS conducted a due diligence of the Aurizon Dynon Rail Terminal (Gate U, corner of Lloyd and Dynon Road, Kensington Victoria) on 7 June 2013. The due diligence was conducted by Paul Schultz, HSE Manager, Toll Mining Services. The facility is utilised as part of their Australian Supply Chain.

The following items were addressed within the due diligence:

- Facility Description
- General Data
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Emergency response was addressed within the *Additional Information* section of the Due Diligence.

The due diligence was compiled through physical visits, interviews and discussions with appropriate personnel and review of applicable documentation.

The due diligence concluded that:

> *Based upon the information obtained in this due diligence assessment, this facility does meet Toll Mining Services' requirements.*

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3.2.6 Qube Port Botany Container Park

TMS conducted a due diligence of the Qube Port Botany Container Park on 21 May 2013. The due diligence was conducted by Sheena Ward, Regional HSET Manager, Toll Global Resources. The facility is utilised as part of their Australian Supply Chain.

The following items were addressed within the due diligence:

- Facility Description
- General Data
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Emergency response was addressed within the Additional Information section of the due diligence.

The due diligence was compiled through physical visits, interviews and discussions with appropriate personnel.

The due diligence concluded that:

> *Based upon the information obtained in this due diligence assessment, this facility does meet Toll Mining Services' requirements.*

3.2.7 Pacific National Chullora Rail Terminal

TMS conducted a due diligence of the Pacific National Chullora Rail Terminal on 21 May 2013. The due diligence was conducted by Sheena Ward, Regional HSET Manager, Toll Global Resources.

The following items were addressed within the due diligence:

- Facility Description
- General Data
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Although emergency response was not specifically addressed within a separate section, it was discussed satisfactorily within the Due Diligence.

The due diligence review was compiled through physical visits, interviews and discussions with appropriate personnel and review of applicable documentation.

The due diligence concluded that:

> *Based upon the information obtained in this due diligence assessment, this facility does meet Toll Mining Services' requirements.*

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3.2.8 Fletchers Rail Terminal

TMS conducted a due diligence of the Fletchers Rail Terminal on 22 May 2013. The due diligence was conducted by Sheena Ward, Regional HSET Manager, Toll Global Resources.

The following items were addressed within the due diligence:

- Facility Description
- General Data
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Although emergency response was not specifically addressed within a separate section, it was discussed satisfactorily within the Due Diligence.

The due diligence review was compiled through physical visits, interviews and discussions with appropriate personnel and review of applicable documentation.

The due diligence concluded that:

> *Based upon the information obtained in this due diligence assessment, this facility does meet Toll Mining Services requirements.*

3.3 Auditor Review of Due Diligences

The due diligences presented were found by the Golder ICMC Technical Specialist to sufficiently evaluate the rail operations and additional management measures by the consigner were not considered necessary.

4.0 LIMITATIONS

Your attention is drawn to the document - “Limitations”, which is included as Appendix A to this report. The statements presented in this document are intended to advise you of what your realistic expectations of this report should be. The document is not intended to reduce the level of responsibility accepted by Golder, but rather to ensure that all parties who may rely on this report are aware of the responsibilities each assumes in so doing.

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Report Signature Page

GOLDER ASSOCIATES PTY LTD

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APPENDIX A

Limitations

LIMITATIONS

This Document has been provided by Golder Associates Pty Ltd ("Golder") subject to the following limitations:

This Document has been prepared for the particular purpose outlined in Golder's proposal and no responsibility is accepted for the use of this Document, in whole or in part, in other contexts or for any other purpose.

The scope and the period of Golder's Services are as described in Golder's proposal, and are subject to restrictions and limitations. Golder did not perform a complete assessment of all possible conditions or circumstances that may exist at the site referenced in the Document. If a service is not expressly indicated, do not assume it has been provided. If a matter is not addressed, do not assume that any determination has been made by Golder in regards to it.

Conditions may exist which were undetectable given the limited nature of the enquiry Golder was retained to undertake with respect to the site. Variations in conditions may occur between investigatory locations, and there may be special conditions pertaining to the site which have not been revealed by the investigation and which have not therefore been taken into account in the Document. Accordingly, additional studies and actions may be required.

In addition, it is recognised that the passage of time affects the information and assessment provided in this Document. Golder's opinions are based upon information that existed at the time of the production of the Document. It is understood that the Services provided allowed Golder to form no more than an opinion of the actual conditions of the site at the time the site was visited and cannot be used to assess the effect of any subsequent changes in the quality of the site, or its surroundings, or any laws or regulations.

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