



August 2010

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## INTERNATIONAL CYANIDE MANAGEMENT CODE CYANIDE TRANSPORTATION AUDIT

# Australian Gold Reagents West Africa Supply Chain - Ghana, Burkina Faso and Mali Summary Report

**Submitted to:**

International Cyanide Management Institute  
888 16th Street, NW - Suite 303  
Washington, DC 20006  
UNITED STATES OF AMERICA

Australian Gold Reagents Ltd  
PO Box 345  
Kwinana, WA 6167  
AUSTRALIA

REPORT



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## **AGR WEST AFRICA SUPPLY CHAIN - GHANA, BURKINA FASO AND MALI SUMMARY AUDIT REPORT**

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Limitations



## 1.0 INTRODUCTION

### 1.1 Operational Information

<b>Name of Transportation Facility:</b>	Australian Gold Reagents West Africa Supply Chain – Ghana, Burkina Faso and Mali
<b>Name of Facility Owner:</b>	Not Applicable
<b>Name of Facility Operator:</b>	Australian Gold Reagents Pty Ltd
<b>Name of Responsible Manager:</b>	Peter Cooper, Commercial Manager - Sodium Cyanide
<b>Address:</b>	Australian Gold Reagents Pty Ltd PO Box 345 Kwinana 6167
<b>State/Province:</b>	Western Australia
<b>Country:</b>	Australia
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<b>E-Mail:</b>	peter.cooper@csbp.com.au

### 1.2 Description of Operation

#### 1.2.1 CSBP Ltd and AGR Australia Limited

AGR is the management company of the unincorporated joint venture between CSBP Ltd (CSBP) and Coogee Chemicals Pty Ltd (Coogee Chemicals). CSBP, a subsidiary of Wesfarmers Ltd., is the major participant in the venture and acts as both plant operator and sales agent. Coogee Chemicals is a local manufacturer and distributor of industrial chemicals.

The AGR cyanide production facility is located within CSBP's fertiliser and chemicals complex at Kwinana, some 40 km south of Perth within the state of Western Australia. AGR produces and transports two different forms of sodium cyanide from the Kwinana production facility, namely solution and solids. Sodium cyanide solution is produced as a 30% liquid and solid sodium cyanide as a >97%, white briquette.

AGR in its capacity as the sales agent for is the consignor and is responsible for the overall management of the sodium cyanide transportation activities including emergency response.

#### 1.2.2 Vehrad Transport and Haulage Limited

Vehrad Transport and Haulage Limited was certified as being fully compliant with the Code on 14 July 2008.


#### 1.2.3 Sodium Cyanide Transportation

AGR's West Africa Supply Chain - Guinea is defined as cyanide transportation from the Fremantle Port, Western Australia, using shipping line to the Ports of Tema and Takoradi in Ghana, including stevedory operations at the Ports and ICMI signatory transporter Vehrad Transport and Haulage for transport to end user mines in Ghana, Burkina Faso & Mali.

Shipping between the Port of Fremantle and the Ports of Tema and Takoradi is conducted by Mediterranean Shipping Company Australia Pty Ltd (MSC). Upon arrival at the Ports of Tema and or Takoradi, the off loading of all containers is performed by Meridian Ports Services Limited (MPS). Vehrad Transport and Haulage transports the containers from the Ports to customer mine sites in Ghana, Burkina Faso and Mali.

AGR West Africa Supply Chain – Ghana, Burkina Faso and Mali

Name of Facility

  
Signature of Lead Auditor

10 August 2010

Date



#### 1.2.4 Transit Storage

Storage in transit does occur at the Ports of Tema and Takoradi while formalities such as customs clearance and carrier releases are performed. Once formalities are complete, the cyanide containers are collected from the Port by Vehrad Transport and Haulage for delivery to customer mine sites in Ghana, Burkina Faso and Mali.

AGR West Africa Supply Chain – Ghana, Burkina Faso and Mali

Name of Facility

Signature of Lead Auditor

10 August 2010

Date



### 1.3 Auditors Findings and Attestation

in full compliance with

AGR West Africa

Supply Chain – Ghana,  
Burkina Faso and Mali is:

in substantial compliance with

The International  
Cyanide Management  
Code

not in compliance with

Audit Company:

Golder Associates

Audit Team Leader:

Edward Clerk, CEnvP (112), RABQSA (020778)

Email:

eclerk@golder.com.au

### 1.4 Name and Signatures of Other Auditors:

Name	Position	Signature	Date
Edward Clerk	Lead Auditor and Technical Specialist		10 August 2010

### 1.5 Dates of Audit:

The AGR West Africa Supply Chain – Ghana, Burkina Faso and Mali Certification Audit was assessed in August 2010 based on the following audit and due diligence reports:

- Due diligence of MSC shipping between the Port of Fremantle and the Ports of Tema and Takoradi. The due diligence was undertaken by AGR in December 2008.
- Due diligence of the Port of Takoradi in Ghana including the Ghana Ports Authority and MPS. The due diligence was undertaken by AGR in May 2009.
- Due diligence of the Port of Tema in Ghana including the Ghana Ports Authority and MPS. The due diligence was undertaken by AGR in May 2009.
- ICMC Summary Audit Report for Vehrad Transport and Haulage Limited in Ghana. The audit was undertaken by Eagle Environmental on 17-20 March 2008.

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.

AGR West Africa Supply Chain – Ghana, Burkina Faso and Mali

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Signature of Lead Auditor

10 August 2010

Date



**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 operation is

in substantial compliance with

**Transport Practice 1.1**

not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

The AGR West Africa Supply Chain – Ghana, Burkina Faso and Mali, is in FULL COMPLIANCE with Transport Practice 1.1 requiring cyanide transport routes to be selected to minimise the potential for accidents and releases.

AGR has implemented a procedure for the selection of transport routes that minimises the potential for accidents and releases or the potential impacts of accidents and releases.

The supply chain routes are assessed prior to commencement of the initial transport. The route selection process includes an assessment of ports and shipping companies along the supply chain. AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from the Port of Fremantle to the destination country or continent. AGR do not consign any product on a vessel that is not a container vessel. No product is shipped by barge, ferry or other means

A due diligence of MSC between Port of Fremantle in Western Australia and the Ports of Tema and Takoradi in Ghana was conducted by AGR in December 2008. The purpose of the due diligence was to ensure AGR shipping of sodium cyanide is conducted in accordance with the International Maritime Dangerous Goods Code (IMDG Code). AGR concluded in the due diligence, that no issues of concern were noted with regards to MSC management and shipping of the sodium cyanide product.

A due diligence of the Ports of Tema and Takoradi, Ghana Ports and Harbour Authority and MPS was conducted by AGR in May 2009. The purpose of the due diligence was to ensure AGR shipping of sodium cyanide through the Ports of Tema and Takoradi using Ghana Ports Authority and MPS is to acceptable standards. AGR concluded in the due diligence, that no issues of concern were noted with regards to the Ghana Ports and Harbour Authority and MPS’ awareness and management of the handling and systems in place for the sodium cyanide product.

AGR has a selection criteria which encourages road transport companies to become signatories to the Code and ultimately compliant with the Code in their own right. AGR maintains a contract with Vehrad Transport and Haulage requiring them to comply with Code requirements and periodic inspections (typically annual) are conducted by AGR to ensure Vehrad Transport and Haulage remains compliant with Code requirements and AGR transporter selection criteria.

AGR West Africa Supply Chain – Ghana, Burkina Faso and Mali

Name of Facility

Signature of Lead Auditor

10 August 2010

Date





AGR requires that Vehrad Transport and Haulage develop and implement a safety program for transport of cyanide through its contract with Vehrad Transport and Haulage. Periodic inspections are conducted by AGR to ensure Vehrad Transport and Haulage remains compliant with Code requirements and AGR transporter selection criteria.

**2.1.5 Transport Practice 1.5**

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

**The operation is**  **in full compliance with** **Transport Practice 1.5**  
 in substantial compliance with  
 not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

The AGR West Africa Supply Chain – Ghana, Burkina Faso and Mali, is in FULL COMPLIANCE with Transport Practice 1.5 requiring the following of international standards for transportation of cyanide by sea and air.

As a Code-certified cyanide producers, AGR has systems in place to ensure their containers are labelled in accordance with the International Maritime Dangerous Goods (IMDG) Code and as required by local regulations or international standards.

A due diligence of MSC between Port of Fremantle in Western Australia and the Ports of Tema and Takoradi in Ghana was conducted by AGR in May 2009. The due diligence noted AGR’s solid sodium cyanide (briquettes) are packed in a 1000 kg approved bulk bag, hermitically sealed in a plastic liner, placed in a wooden box on pallet base or IBC. As per the IMDG Code this packaging is referenced as UN 11HD2/X/. Approval of AGR’s sodium cyanide packaging has been granted by the regulator and AGR has been given the approval reference AGR 6012, which is to be displayed on the packaging label.

AGR’s label states the product name, UN Number and marine pollutant mark. Product class and subsidiary risk labels are placed on two sides of the IBC (specifically the sides that allow fork-lift access). Placards stating the UN 1689 Number/Class 6 (Toxic) Diamond and Marine Pollutant Mark are placed on each side and on each end of the cargo transport unit (sea container).

AGR has determined that MSC complies with the stowage and separation requirements of Part 7 of the IMDG Code.


**2.1.6 Transport Practice 1.6**

**Track cyanide shipments to prevent losses during transport.**

**The operation is**  **in full compliance with** **Transport Practice 1.6**  
 in substantial compliance with  
 not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

The AGR West Africa Supply Chain – Ghana, Burkina Faso and Mali, is in FULL COMPLIANCE with Transport Practice 1.6 requiring the tracking of cyanide shipments to prevent losses during transport.

<u>AGR West Africa Supply Chain – Ghana, Burkina Faso and Mali</u>		<u>10 August 2010</u>
Name of Facility	Signature of Lead Auditor	Date



## AGR WEST AFRICA SUPPLY CHAIN - GHANA, BURKINA FASO AND MALI SUMMARY AUDIT REPORT

AGR requires that Vehrad Transport and Haulage track cyanide shipments to prevent losses during transport through its contract with Vehrad Transport and Haulage. Periodic inspections are conducted by AGR to ensure Vehrad Transport and Haulage remains compliant with Code requirements and AGR transporter selection criteria.

A due diligence of MSC between Port of Fremantle in Western Australia and the Ports of Tema and Takoradi in Ghana was conducted by AGR in May 2009. All MSC vessels have continuous means of tracking and communication during their voyages and the Global Customer Service System (GCSS) monitors the containers through the handling and shipping. AGR utilises MSC for part of its international ocean freight as MSC offers complete service from AGR's despatch Port of Fremantle to the destination port required by AGR. The documentation during shipment remains with AGR and MSC. AGR contracts directly with MSC and does not go through a third party or Freight Forwarder.

AGR West Africa Supply Chain – Ghana, Burkina Faso and Mali

Name of Facility

Signature of Lead Auditor

10 August 2010

Date



**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 operation is

in substantial compliance with

**Transport Practice 2.1**

not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

The AGR West Africa Supply Chain – Ghana, Burkina Faso and Mali, is in FULL COMPLIANCE with Transport Practice 2.1 requiring the design, construction and operation of cyanide trans-shipping depots and interim storage sites to prevent release and exposures.

Within the scope of this Supply Chain, Storage in transit does occur at the Ports of Tema and Takoradi while formalities such as customs clearance and carrier releases are performed. A due diligence of the Ports of Tema and Takoradi, Ghana Ports and Harbour Authority and MPS was included within the AGR May 2009 due diligence. The purpose of the due diligence was to ensure AGR shipping of sodium cyanide through the Ports of Tema and Takoradi using Ghana Ports Authority and MPS is to acceptable standards. AGR concluded in the due diligence, that no issues of concern were noted with regards to the Ghana Ports and Harbour Authority and MPS’ awareness and management of the handling and systems in place for the sodium cyanide product.

AGR West Africa Supply Chain – Ghana, Burkina Faso and Mali

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Date



## 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.

The operation is  in full compliance with **Transport Practice 3.1**  
 in substantial compliance with  
 not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

The AGR West Africa Supply Chain – Ghana, Burkina Faso and Mali, is in FULL COMPLIANCE with Transport Practice 3.1 requiring the preparation of detailed Emergency Response Plans for potential cyanide releases.

AGR requires that Vehrad Transport and Haulage prepare detailed Emergency Response Plans for potential cyanide releases through its contract with Vehrad Transport and Haulage. Periodic inspections are conducted by AGR to ensure Vehrad Transport and Haulage remains compliant with Code requirements and AGR transporter selection criteria.

In the event of an incident, AGR provide technical support to Vehrad Transport and Haulage.

### 2.3.2 Transport Practice 3.2

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

The operation is  in full compliance with **Transport Practice 3.2**  
 in substantial compliance with  
 not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

The AGR West Africa Supply Chain –Guinea is in FULL COMPLIANCE with Transport Practice 3.2 requiring the designation of appropriate response personnel and commit necessary resources for emergency response.

AGR requires that Vehrad Transport and Haulage designate appropriate response personnel and commit necessary resources for emergency response through its contract with Vehrad Transport and Haulage. Periodic inspections are conducted by AGR to ensure Vehrad Transport and Haulage remains compliant with Code requirements and AGR transporter selection criteria.

AGR West Africa Supply Chain – Ghana, Burkina Faso and Mali

Name of Facility

Signature of Lead Auditor

10 August 2010

Date



**2.3.3 Transport Practice 3.3**

**Develop procedures for internal and external emergency notification and reporting.**

**in full compliance with**

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

not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

The AGR West Africa Supply Chain – Ghana, Burkina Faso and Mali, is in FULL COMPLIANCE with Transport Practice 3.3 requiring the development of procedures for internal and external emergency notification and reporting.

AGR requires that Vehrad Transport and Haulage develop procedures for internal and external emergency notification and reporting through its contract with Vehrad Transport and Haulage. Periodic inspections are conducted by AGR to ensure Vehrad Transport and Haulage remains compliant with Code requirements and AGR transporter selection criteria.

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

not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

The AGR West Africa Supply Chain – Ghana, Burkina Faso and Mali, is in FULL COMPLIANCE with Transport Practice 3.4 requiring the development of procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

AGR requires that Vehrad Transport and Haulage develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment through its contract with Vehrad Transport and Haulage. Periodic inspections are conducted by AGR to ensure Vehrad Transport and Haulage remains compliant with Code requirements and AGR transporter selection criteria.

**2.3.5 Transport Practice 3.5**

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

**in full compliance with**


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

not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

The AGR West Africa Supply Chain – Ghana, Burkina Faso and Mali, is in FULL COMPLIANCE with Transport Practice 3.5 requiring the periodic evaluation of response procedures and capabilities and revise them as needed.

AGR West Africa Supply Chain – Ghana, Burkina Faso and Mali

  
Signature of Lead Auditor

10 August 2010

Date



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## AGR WEST AFRICA SUPPLY CHAIN - GHANA, BURKINA FASO AND MALI SUMMARY AUDIT REPORT

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AGR requires that Vehrad Transport and Haulage periodically evaluate response procedures and capabilities and revise them as needed through its contract with Vehrad Transport and Haulage. Periodic inspections are conducted by AGR to ensure Vehrad Transport and Haulage remains compliant with Code requirements and AGR transporter selection criteria.

AGR West Africa Supply Chain – Ghana, Burkina Faso and Mali

Name of Facility

Signature of Lead Auditor

10 August 2010

Date



### **3.0 SEA TRANSPORT SUMMARY**

#### **3.1 MSC Australia Pty Ltd**

##### **3.1.1 Audit and Operational Information**

MSC is a carrier service providing International shipping of containers on a fleet of their container vessels.

A due diligence investigation of compliance with the ICMI Transport Code of Practice of MSC shipping between the Port of Fremantle in Western Australia and the Port of Conakry in the Republic of Guinea was conducted by AGR in December 2008. The due diligence investigation was undertaken within one year of the October 26 2009 Code changes and hence qualifies pursuant to ICMI's Transition Process for inclusion in this supply chain audit.

##### **3.1.2 Scope and Summary of Due Diligence Investigation**

The purpose of the due diligence was to ensure AGR's shipping of sodium cyanide is conducted in accordance with the International Maritime Dangerous Goods Code (IMDG Code). The following items were addressed within the AGR due diligence:

- Background information on MSC
- Compliance with ICMC:
  - Transport Practice 1.1
  - Transport Practice 1.5
  - Transport Practice 1.6
  - Dangerous Goods Management.
- Australian Shipping Regulatory Framework:
  - Australian Maritime Safety Authority (AMSA)
  - International Convention for the Safety of Life at Sea (SOLAS)
  - Port State Control.
- Australian Department of Defence.

AGR concluded in the due diligence, that no issues of concern were noted with regards to MSC management and shipping of the sodium cyanide product. The due diligence also noted that the report is not a final acceptance of MSC by AGR for future work and, as with all service providers; AGR will continue to review and monitor MSC's performance. In particular, AGR noted that any changes in state, national or international regulations, standards or laws can result in a total review of the international shipping requirements.

This due diligence report was reviewed by the audit team's transport technical auditor, Edward Clerk, who found that the operations of MSC Shipping had been comprehensively evaluated through AGR's due diligence process.

AGR West Africa Supply Chain – Ghana, Burkina Faso and Mali

Name of Facility

Signature of Lead Auditor

10 August 2010

Date



## **3.2 Port of Ports of Takoradi and Tema, Ghana Ports Authority and Meridian Ports Services Limited**

### **3.2.1 Audit and Operational Information**

A due diligence of the Ports of Tema and Takoradi, Ghana Ports and Harbour Authority and MPS was conducted by AGR in May 2009. The purpose of the due diligence was to ensure AGR shipping of sodium cyanide through the Ports of Tema and Takoradi using Ghana Ports Authority and MPS is to acceptable standards. The due diligence investigation was undertaken within one year of the October 26 2009 Code changes and hence qualifies pursuant to ICMI's Transition Process for inclusion in this supply chain audit.

### **3.2.2 Scope and Summary of Due Diligence Investigation**

The following items were addressed within the due diligence:

- Introduction
- Background information on the Ports of Takoradi and Tema
- Background information on Ghana Ports Authority
- Background information on MPS
- Compliance with ICMC
  - Transport Practice 1.1.
  - Transport Practice 1.5.
  - Transport Practice 1.6.
  - Dangerous Goods Management.

AGR concluded in the due diligence, that no issues of concern were noted with regards to the Ghana Ports and Harbour Authority and Meridian Port Services Limited's awareness and management of the handling and systems in place for the sodium cyanide product. AGR through its Ghanaian transport service provider and AGR's Consultant in Ghana have ongoing involvement with the Ports. AGR note that the due diligence is not a final acceptance of Ghana Ports and Harbour Authority for future work and as with all service providers to AGR, AGR will continue to review and monitor their performance; this will include ongoing and regular contact to maintain awareness and preparedness.

This due diligence report was reviewed by the audit team's transport technical auditor, Edward Clerk, who found that the operations of the Ports of Tema and Takoradi have been comprehensively evaluated through the due diligence.

## **4.0 TRUCK TRANSPORT SUMMARY**

Vehrad Transport and Haulage are certified under the International Cyanide Management Code for the Manufacture, Transport, and Use of Cyanide In the Production of Gold as of August 18, 2009.

No truck transporters, outside of Vehrad Transport and Haulage, are used in this part of the supply chain.

AGR West Africa Supply Chain – Ghana, Burkina Faso and Mali

Name of Facility

Signature of Lead Auditor

10 August 2010

Date



## Report Signature Page

**GOLDER ASSOCIATES PTY LTD**

A handwritten signature in black ink, appearing to read 'E. Clerk', written over a light blue horizontal line.

Edward Clerk  
ICMI Lead Auditor, Associate and Manager Mining Environmental Services

EWC/ST/lgs

A.B.N. 64 006 107 857

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# **APPENDIX A**

## **Limitations**



## LIMITATIONS

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