



August 2011

ICMI RECERTIFICATION SUMMARY REPORT

Freight Forwarders Tanzania Ltd

Submitted to:

International Cyanide Management Institute
(ICMI)
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Washington, DC 20006
United States of America

Freight Forwarders Tanzania Ltd
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Tanzania

REPORT

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1.0 SUMMARY AUDIT REPORT FOR TRANSPORTATION

Name of Cyanide Transportation Facility: Freight Forwarders Tanzania (FFT)
Name of Facility Owner: Freight Forwarders Tanzania Ltd.
Name of Facility Operator: Freight Forwarders Tanzania Ltd.
Name of Responsible Manager: James Redfern, General Manager FFT
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2.0 LOCATION DETAIL AND DESCRIPTION OF OPERATION

2.1 Freight Forwarders Tanzania Ltd

FFT became a Signatory to the Code in November 2007 and was certified as being fully compliant with the Code on 22 May 2008.

FFT is part of the Freight Forwarders Group that includes clearing, forwarding and logistics organisations.

FFT coordinate cyanide transportation within Tanzania, and subcontracts the trucking component of transportation to Golden Coach Limited/Golden Fleet Ltd (GCL/GFL) and Mainline Carriers Ltd (MCL).


FFT has been transporting cyanide since 1998 when large scale gold mining started in Tanzania. Initially the transportation was by rail as the roads were of a poor standard. In 2003 the transportation switched to road due to infrastructure improvements and has remained so since that time.

Cyanide from producers Orica Australia Limited (Queensland, Australia) and Australian Gold Reagents Pty Ltd (Western Australia, Australia) arrives in Tanzania through the Port of Dar es Salaam which is operated by the Tanzania Ports Authority (TPA).

FFT transport cyanide from the Port of Dar es Salaam to customer mine sites in convoy. The loaded convoy of trucks with two escort vehicles departs the Port. The convoy usually leaves the city of Dar es Salaam for the client mine sites. However, if loading takes place overnight or finishes after 3 pm, the convoy drives to the FFT Ilala interim storage facility as per the company procedures for overnight storage to avoid travelling in the hours of darkness.

FFT has capacity to temporarily store cyanide containers at the Ilala interim storage facility while logistical arrangements are made to transport the cyanide to customer mine sites. At the time of the audit, FFT delivered to five client sites within Tanzania. If required they are also able to deliver to another mine site, North Mara mine; normally serviced by Freight Forwarders Kenya Limited as shown in Table 1.

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Table 1: Mines delivered to by FFT

Client	Mine	Supplier	Distance (km)	Travel time (days)
African Barrick Gold	Bulyanhululu Mine (Buly)	Orica	1,120	3 - 4
African Barrick Gold	Tulawaka Mine	Orica	1,215	3 - 4
African Barrick Gold	Buzwagi Mine	Orica	1,026	3
African Barrick Gold	North Mara Mine *	Orica	1,500	4 - 5
Anglo Gold Ashanti	Geita Gold Mine	Orica	1,180	3 - 4
Resolute	Gold Pride Mine	AGR	933	3

* normally supplied from Freight Forwarders Kenya in Mombasa.

2.1.1 Ilala Interim Storage Facility

FFT's Ilala interim storage facility is located off Pugu Road in a light industrial area close to the Dar es Salaam airport at coordinates -6.854589 39.224265. It has an access road along the western boundary and a railway along the northern boundary. The entrance is located on the western side.

At the time of the Recertification Audit site visit no cyanide was held at the interim storage facility.

2.2 Golden Coach Limited and Golden Fleet Ltd

Golden Coach Ltd (GCL) and Golden Fleet Ltd (GFL) have been in operation for over 30 years and are located off Nelson Mandela Road at coordinates -6:50:59 39:15:49 in Dar es Salaam. GCL and GFL are separate companies with separate agreements with FFT. However, they operate out of the same location, using the same management team, vehicles and trailers. Throughout the remainder of the report we have denoted them as GCL/GFL. GCL/GFL's main client is Freight Forwarders Tanzania Ltd.

GCL/GFL has a fleet of over 120 trucks and 140 trailers and provides services throughout Tanzania and its neighbouring countries such as Kenya, Uganda, Burundi and Rwanda. The company specialises in bulk and containerised cargo deliveries. Services offered by GCL include:

- General cargo haulage;
- Abnormal/out of gauge cargo haulage;
- Hazardous goods haulage; and
- Consolidated cargo haulage.

The company maintains its vehicles at its own workshop.


2.3 Mainline Carriers Ltd

Mainline Carriers Ltd (MCL) has been in operation for over 20 years and is located at Mbagala Industrial Estate in the south of Dar es Salaam at coordinates -6:54:43 39:15:57. MCL provide services throughout Tanzania and its neighbouring countries such as Kenya, Uganda, Malawi and Zambia as well as long haul trips to Johannesburg, South Africa. The company specialise in hazardous goods including cyanide and other general freight.

Services offered by MCL include:

- General cargo haulage;

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- Abnormal/out of gauge cargo haulage;
- Hazardous goods haulage;
- Consolidated cargo haulage (Dar es Salaam to Johannesburg, and back); and
- Rigging Transformers/heavy power generators.

The Company maintains its vehicles at its own workshop.

2.4 Freight Forwarders Group

The Freight Forwarders Group (FFG) is a well established clearing, forwarding and logistics organisation that traces its roots back to 1932, making it one of the oldest logistics firms in East Africa. The Group has developed and sustained a wide variety of logistics-related infrastructure in the region and has maintained a market leading presence for several decades. The Group includes the following entities:

- Freight Forwarders Kenya Ltd;
- Freight Forwarders Tanzania Ltd;
- Freight Forwarders East Africa Ltd;
- Transeast Uganda Ltd;
- Transeast Ltd;
- Multiport International Ltd;
- Allied Wharfage Ltd;
- Easytrans Ltd;
- Mainline Carriers Ltd; and
- Minetec Tanzania Ltd.



PRINCIPLE 1 – TRANSPORT

Transport Cyanide in a Manner that Minimizes the Potential for Accidents and Releases

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

[X] 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:

FFT, with its subcontractors GCL/GFL and MCL, and clients have implemented a procedure for the transport route selection to minimise potential for accidents and releases, in an environment where there are limited practical alternative transport routes.

The transport routes have been periodically reviewed and analysed for risks and restrictions. Numerous actions were identified and implemented to improve safety during this process. Drivers also assess and report on conditions during each trip. FFT, its clients and suppliers have consulted various stakeholders and applicable governmental agencies as necessary in the selection of routes and development of cyanide management measures.

Convoys are used for every delivery as a means of managing the risks along the routes (traffic and people, poor road conditions). Each convoy is led by a support vehicle and fitted with signs and flags.

FFT largely manages its own emergency response but it has contacted emergency support services (Police and Hospitals) along the route each year. These stakeholders were consulted on cyanide and advised of their roles during an emergency.

FFT subcontracts the transport of cyanide to MCL, GCL and GFL under Service Level Agreements. The Service Level Agreements require MCL and GCL and GFL to comply with the ICMI. FFT has developed and implemented an audit protocol to assist in the subcontractor performance assessment.

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

[X] in full compliance with

The operation is

[] in substantial compliance with

Transport Practice 1.2

[] not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

FFT does not own and operate transport trucks directly as this is contracted to MCL and GCL/GFL. FFT does however manage the Ilala interim storage facility and associated equipment within this storage facility,

FFT has only used trained and competent operators to drive its fork lift trucks within its interim storage facility. Both GCL/GFL and MCL have only used trained and competent operators to drive its trucks and the companies maintain files on their drivers that contain copies of licences (heavy vehicle drivers licences) and training records. FFT also maintains copies of the licences of its subcontractor drivers.

There is no requirement in Tanzania for drivers to be licensed for dangerous goods transport. However, all personnel from FFT, MCL and GCL/GFL operating cyanide handling and transport equipment have been

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trained to perform their jobs in a manner that minimises the potential for cyanide releases and exposures. The training of cyanide handling and transport equipment operators is coordinated by FFT.

Interviews with equipment operators at FFT and drivers at MCL and GCL/GFL indicated that all FFT and subcontractor personnel operating cyanide handling and transport equipment are competent to perform their jobs in a manner that minimises the potential for cyanide releases and exposures.

FFT subcontracts the transport of cyanide to MCL, GCL and GFL under Service Level Agreements. The Service Level Agreements require MCL and GCL and GFL to comply with the ICMC. FFT has developed an audit protocol to assist in the subcontractor performance assessment and this has been used through the period 2009 to 2011.

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

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

FFT and its subcontractors MCL and GCL/GFL only use equipment designed and maintained to operate with the design loads.

FFT has procedures in place to verify the adequacy of the equipment for the load it must bear and its fitness for purpose. FFT has performed daily vehicle checks during the convoys carried out between 2008 and 2011, and these are documented. MCL and GCL subcontractors also have routine maintenance schedules and ad hoc maintenance procedures that include checks for structural problems on the vehicles. These checks were performed during the period 2008 to 2011. Both MCL and GCL/GFL maintain records of vehicle specifications and maintenance history. FFT have performed maintenance checks on the forklift truck which is of sufficient capacity to lift full cyanide containers.

FFT has procedures in place to prevent overloading of the transport vehicles being used for handling cyanide. MCL and GCL/GFL trucks and trailers were purchased to a design specification appropriate for the cyanide transport task. Both MCL and GCL/GFL have sufficient vehicles for transporting cyanide to ensure that no other vehicles are used. In addition, the load limits of the containers, the axle loadings allowed for the vehicles and the vehicle design specifications ensure that the vehicles will not be overloaded. The procedures and inspections carried out ensure that only one cyanide container is loaded and that no other freight is added to the vehicles.

FFT subcontracts the transport of cyanide to MCL, GCL and GFL under Service Level Agreements. The Service Level Agreements require MCL and GCL and GFL to comply with the ICMC. FFT has developed an audit protocol to assist in the subcontractor performance assessment and this has been used through the period 2009 to 2011.

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

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

FFT has implemented procedures which have ensured that the cyanide is transported in a manner that maintains the integrity of the packaging by its subcontractors. These include ensuring that containers are

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securely attached to the trailers using twistlocks and frequent inspection that the secure attachment remains in place during the convoy.

Signs have been also used by FFT by its subcontractors to identify shipments as containing cyanide for each convoy. These signs are attached to the lead vehicles and all cyanide containing vehicles. In addition, the vehicles carry red flags and dipped headlights are used. The signage is inspected prior to starting the convoy and at various stops each day as the convoy progresses.

Equipment consists of road vehicles that were purchased to a design specification appropriate to carry the cyanide containers by FFT's subcontractors. FFT has developed a Safety Program which is implemented in conjunction with its subcontractors MCL and GCL/GFL. This includes vehicle inspections prior to each shipment and preventive maintenance activities. Limitations on driver hours are also managed by convoy leaders who ensure that driver hours are limited each day, and through the use of the GPS system which also monitors driver hours. Procedures have been followed to prevent loads from shifting. Procedures are also in place for modifying or suspending travel during severe weather and the convoy leaders assess conditions and can take appropriate action.

FFT and its sub-contractors have drug prevention policies. Records are maintained for all aspects of the Safety Program.

FFT subcontracts the transport of cyanide to MCL, GCL and GFL under Service Level Agreements. The Service Level Agreements require MCL and GCL and GFL to comply with the ICMC. FFT has developed an audit protocol to assist in the subcontractor performance assessment and this has been used through the period 2009 to 2011.

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

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

FFT does not transport cyanide by sea or air and so Transport Practice 1.5 does not apply.

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

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.6


not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Through its sub-contractors MCL and GCL/GFL, FFT has effective means of communication with their transport vehicles. Communication systems include GPS tracking which is used for all cyanide shipments; the use of satellite and long-range cell phones which are continuously on. All communication equipment is checked during the convoy pre-checks prior to the start of each convoy.

Communication risk areas only relate to small areas where the cell phone may not have a signal, but a satellite phone is carried to cover these areas.

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FFT has systems to track the progress of cyanide shipments. FFT's subcontractors use a GPS system (which is continuously monitored) to track progress along the routes while FFT log convoy movements using telephone text messaging, which are also recorded. All information is shared between the parties.

FFT has appropriate inventory controls and/or chain of custody documentation to prevent loss of cyanide during shipment. Vehicles are also weighed at weighbridge stations along the route which verifies that no material is lost. All trucks carry a material safety datasheet for sodium cyanide.

FFT subcontracts the transport of cyanide to MCL, GCL and GFL under Service Level Agreements. The Service Level Agreements require MCL and GCL and GFL to comply with the ICMC. FFT has developed an audit protocol to assist in the subcontractor performance assessment and this has been used through the period 2009 to 2011.

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PRINCIPLE 2 – INTERIM STORAGE

Design, Construct and Operate Cyanide Trans-shipping Depots and Interim Storage Sites to Prevent Releases and Exposures.

Interim Storage

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

in full compliance with

The operation is in substantial compliance with **Interim Storage Practice 2.1**

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The Ilala interim storage facility is secured to prevent unauthorised access to cyanide, and has appropriate warning signs alerting workers (no smoking, eating and drinking in the cyanide storage area, no naked flames in the cyanide storage area, and PPE requirements). No other incompatible materials such as acids, strong oxidisers and explosives are stored at the Ilala interim storage facility.

Cyanide is stored within shipping containers that are designed to minimise the potential for contact of solid cyanide with water

Cyanide stored with adequate ventilation to prevent build-up of hydrogen cyanide gas and the shipping containers are not opened while in storage and they are stored outside on a hardstand area.

Systems and resources are in place on the site to contain and remediate any spilled cyanide materials and minimise the extent of a release.



PRINCIPLE 3 – EMERGENCY RESPONSE

Ensure that Process Controls are Protective of the Environment.

Emergency Response

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

in full compliance with

The operation is in substantial compliance with **Emergency Response Practice 3.1**

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

FFG has developed and implemented an Emergency Response Guide (CPERG) which forms an appendix to its Emergency Management document. FFT utilises this procedure.

The CPERG has been adapted by FFG from Orica Australia Limited's (Orica) Emergency Response Guide. The Orica Emergency Response Guide provides guidance in the development of specific site and transport route emergency response plans for the management of incidents involving spillage of Orica sodium cyanide product. The document has been modified by FFG to suit the conditions of Kenya and Tanzania.


The CPERG has been developed to be appropriate for the selected transportation routes and interim storage facility, transport infrastructure, the physical and chemical form of cyanide and the design of the transport vehicle.

The CPERG covers specific circumstances where it will be used. The document includes Emergency Response Guides for specific scenarios including:

- RG1 Dry Sodium Cyanide Spill inside interim storage facility;
- RG2 Dry Sodium Cyanide Spill outside interim storage facility;
- RG3 Dry Sodium Cyanide Spill Inside a Sea Container;
- RG4 Sea Container Decontamination;
- RG5 Handling Wet Sodium Cyanide;
- RG6 Dry Sodium Cyanide Spill to a Waterway;
- RG7 Decontamination of a Spill of Solid Cyanide into Soil; and
- RG8 Response to an Incident with a Fire Involving Sodium Cyanide.

External responders identified in the documents are aware of their role in an emergency.

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Emergency Response

Practice 3.2:

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

in full compliance with

The operation is

in substantial compliance with

Emergency Response Practice 3.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

FFT and its subcontractors MCL and GCL/GFL provide the same training to their respective employees which is provided by the HSE and Training Manager for GCL/GFL and MCL. The emergency response training is given to all appropriate personnel. All drivers transporting cyanide receive a Cyanide Awareness course which is then followed periodically by Cyanide Convoy Procedures.

The CPERG document identifies the key roles and responsibilities in the event of an emergency for the following positions:


- Convoy Leader;
- Convoy Truck Driver;
- Escort Personnel;
- Record Keeper;
- Communications Person;
- Interim storage yard Supervisor; and
- Interim storage yard Worker.

The requirements are clear and unambiguous and are also covered in the training programmes.

All emergency response equipment is taken in the Emergency Response vehicles as no other equipment is available en route. A list of emergency response equipment is documented on a checklist. The equipment is checked and tested before every convoy of vehicles leaves. All drivers are issued with a 'Get Out Alive' kit bag when the convoy assembles that includes essential PPE and an MSDS for sodium cyanide written in Swahili.

FFT subcontracts the transport of cyanide to MCL, GCL and GFL under Service Level Agreements. The Service Level Agreements require MCL and GCL and GFL to comply with the ICMC. FFT has developed an audit protocol to assist in the subcontractor performance assessment and this has been used through the period 2009 to 2011.

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Emergency Response

Practice 3.3:

Develop procedures for internal and external emergency notification and reporting.

in full compliance with

The operation is

in substantial compliance with

Emergency Response Practice 3.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Section 1 Emergency Call List and Section 6 Plan Activation of the CPERG contains details on how the emergency response procedures are activated including details of who is contacted. This includes emergency personnel, internal personnel, the shipper, the receiver and the regulatory authorities.

A test of the numbers of the internal and external responders is undertaken annually and reported in a Comms Response document. This document was seen for an exercise undertaken on 5 May 2011 when both internal and external responders were called to test the numbers and the level of response.

Emergency Response

Practice 3.4:

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

in full compliance with

The operation is

in substantial compliance with

Emergency Response Practice 3.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The Emergency Response Guide RG 7 within the CPERG details the decontamination of a Spill of Solid Cyanide into Soil and also includes details if water is impacted.

It includes a procedure for disposal of cyanide contaminated soil and wash water. It states that contaminated soil and spilt material will be disposed of at a mine site heap leach facility/tailings. There are also procedures for dealing with a dry spill and for dealing with a wet spill.

The Emergency Response Guide RG 7 within the CPERG details the requirements for decontamination of a 'Spill of Solid Cyanide into Soil'. The document prohibits the use of chemicals ferrous sulphate, and hydrogen peroxide. The Emergency Guide recommends the use of sodium hypochlorite for use in soil contamination.

Emergency Response

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


Emergency Response Practice 3.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The CPERG contains provisions for periodically reviewing and evaluating its adequacy and they are being implemented.

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In addition to this the Review and Audit Process Section of the CPERG states that the responsible people are required to coordinate a review at least annually, and after any of the following resulting from or affected by the transportation of cyanide:

- Incidents;
- Emergencies;
- Emergency exercises; and
- Transportation audits and assessments.

A Mock Drill was undertaken on 10 June 2011. The drill involved a simulated vehicle incident and associated cyanide spill. The drill took place on one truck in a 16 truck convoy on their way to Geita and Resolute Gold Mines. The drill involved Morogoro Regional Police, Morogoro District hospital and Kibubu Crane hire agent. Following the drill the write up included areas where improvements could be made which included additional training requirements. Since the drill a number of these training requirements have been undertaken and others are planned.

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ICMI Lead Auditor/Project Manager

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Reviewer

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