

## Corrective Action Plan

Verification Protocol Item	Audit Finding Summary	Corrective Action Description	Evidence Required	Completion Date
1.6.3. Have communication blackout areas along transport routes been identified?	No formal procedure appears to exist to identify potential blackout areas, although blackout areas for mobile phones have been identified along some routes. The combination of the various available communications equipment (including mobile and satellite phones, real time remote GPS tracking, UHF radios, railway tracking systems, etc) recognises the fact some methods may not always be effective along the transport routes.	Review and update the CSBP Cyanide Transport Route Review and Risk Assessment Procedure (DP-09-110-18) to include a section to: <ul style="list-style-type: none"> <li>• Identify communications available on each transport route; and</li> <li>• Identify and report on any black out areas.</li> </ul>	Copy of the updated Cyanide Transport Route Review and Risk Assessment Procedure (DP-09-110-18).	Sep 15, 2006
1.6.6 Are Material Safety Data Sheets (MSDS) available during transport?	MSDS do not accompany the shipping documents and are not specifically required to be available within the cabin of the road vehicle or lead railway locomotive. Superseded out of date MSDS sheets were sighted within the cabin of some prime mover vehicles, transshipping and interim storage facilities during the audit.  Informal discussions with the responsible government personnel indicates the initial emergency response guide has some inconsistencies in relation to sodium cyanide and that there is no objection to including specific MSDS within the road vehicle cabin or lead locomotive.	Review and update the CSBP Vehicle Operators Handbook (GM-09-110-02) to include MSDS (possibly as an appendix) for liquid and/or solid sodium cyanide.  Review and update the CSBP Sodium Cyanide Dangerous Goods Checklist (SF1740) to include the requirement to remove any superseded or uncontrolled MSDS.  Notify and distribute the updated Vehicle Operators Handbook and checklist to the road contractors, and the updated MSDS for the railway contractor.	Copy of the updated Vehicle Operators Handbook (GM-09-110-02) and updated Sodium Cyanide Dangerous Goods Checklist (SF1740).  Copy of notification to all road contractors, confirming distribution of the updated handbook and checklist, including the requirement to remove all superseded MSDS as appropriate.  Copy of notification to railway contractor in relation to distribution of updated MSDS for the lead locomotive, transshipping and interim storage facilities, including the requirement to remove all superseded MSDS as appropriate.	Sep 15, 2006

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June 30, 2006

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2.1.1 Are warning signs posted alerting workers 1) that cyanide is present; 2) that smoking, open flames, eating and drinking are not allowed and 3) what personal protective equipment must be worn?	Limited signage was evident at the railway contractor's interim storage facility (although it is acknowledged the facility upgrade was under construction at the time of the audit).	CSBP to ensure that all necessary signage is in place at the Kalgoorlie West interim storage facility in accordance with the contractor's Dangerous Goods Plan and ICMI Code requirements on completion of the railway contractor's facility upgrade.	Photographic evidence of the Kalgoorlie West interim storage facility demonstrating appropriate signage is in place.  Additional evidence could include a signed statement from the railway contractor's dangerous goods consultant that the facility meets the requirements of the applicable local dangerous goods regulations, dangerous goods code and ICMI code requirements.	Sep 15, 2006
2.1.2 Are there security measures in place to prevent unauthorized access to cyanide, such as lockouts on valves and fenced and locked storage of solids?	Details of security measures during transport are described within the Transport Management Plan (CSBP, 2006f), including vessel design, restraint, fittings and seals.  A draft security plan was sighted during the audit for the railway contractor's transshipping and interim storage facilities. Due to the sensitivity of security issues regarding the interim storage of cyanide, no description of this aspect is provided in accordance with Code reporting guidelines.	Confidential correspondence between CSBP and auditors in accordance with the Code reporting guidelines for security related action items.	Confidential correspondence between CSBP and auditors in accordance with the Code reporting guidelines for security related action items.	Sep 15, 2006

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<p>3.2.1 Does the transporter provide emergency response training of appropriate personnel?</p>	<p>A training schedule has been developed and implemented for the CSBP Emergency Response team personnel and records of training are maintained by the CSBP Emergency Response Manager.</p> <p>However no specific training matrix (or similar mechanism) is available to ensure that all Emergency Response Team members are competently trained in the necessary skills/tasks, particularly in relation to initial/refresher training for key or critical competency aspects.</p>	<p>The CSBP Training Department, together with the Emergency Response Management to undertake a full and detailed training needs review to determine and develop a matrix of training and key competency skills for the Emergency Response Team personnel.</p> <p>The review should determine what the critical training needs and competencies are and how frequently any refresher training should be undertaken.</p> <p>The analysis should include a review of each Emergency Response Team members past and present training records against the new training needs analysis requirements, to identify any training deficiencies.</p> <p>Review and update the CSBP training department Emergency Response Team procedures to reflect the corrective action items described above, and include mechanism(s) to help ensure the training schedule is implemented and delivered as appropriate.</p>	<p>Copy of the training needs analysis, including identification of key or critical training needs and the frequency of refresher training.</p> <p>Copy of the training review for a sample of the Emergency Response Team members, together with a schedule to undertake and correct any identified training deficiencies.</p> <p>Copy of the updated training procedures including mechanism(s) to ensure the training schedule is implemented and delivered.</p>	<p>Sep 15, 2006</p>

