SUMMARY AUDIT REPORT

AUSTRALIAN GOLD REAGENTS PTY LTD
WEST AUSTRALIA SUPPLY CHAIN

ICMI CYANIDE TRANSPORTATION VERIFICATION PROTOCOL RECERTIFICATION AUDIT MARCH 2013

AGR Pty Ltd.
WA Supply Chain

Signature of Lead Auditor

27 May 2013
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WA Supply Chain

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## APPROVAL & CHANGE HISTORY

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1. **INTRODUCTION**

1.1. **Operator Details**

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<th>Name of Cyanide Transportation Facility:</th>
<th>West Australian Supply Chain</th>
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<tr>
<td>Name of Facility Owner:</td>
<td>Australian Gold Reagents Pty. Ltd.</td>
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<td>Name of Facility Operator:</td>
<td>CSBP Ltd</td>
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<tr>
<td>Name of Responsible Manager:</td>
<td>Tony Kelly, Technical Support Manager – AGR Sodium Cyanide</td>
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1.2. **Description of Operation**

Australian Gold Reagents Pty. Ltd. (AGR) is the management company of the unincorporated joint venture between CSBP Ltd. and Coogee Chemicals Ltd. CSBP is part of the Wesfarmers Chemicals, Energy and Fertilisers Division of Wesfarmers Ltd. CSBP is the major participant in the venture and acts as both plant operator and sales agent. Coogee Chemicals Ltd. 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% solution and solid sodium cyanide as a >97% white briquette.

CSBP, in its capacity as the sales agent for AGR, is responsible for the overall management of the sodium cyanide transportation activities including emergency response in accordance with the relevant statutory obligations, Ministerial Conditions and the Western Australia Hazardous Materials Emergency Management Plan (HAZMAT). CSBP assumes the responsibility of "consignor" under the Western Australia Dangerous Goods Transport legislation.

The transportation of both solution and solid sodium cyanide within Western Australia is undertaken by rail and/or road along recognised dangerous goods routes classified by the relevant authorities. The transport distribution network includes contracted transport providers servicing the Fremantle Port (for export) and various gold mining operations located within Western Australia, the overall management of which is provided by way of the CSBP Sodium Cyanide Transport Management Plan. The transport distribution network is termed the West Australian Supply Chain.

The **West Australian Supply Chain** includes the following components:

- **Australian Gold Reagent (AGR):** Its primary role in the supply chain is that of the cyanide consignor. In this role, the major areas where AGR provides services and support to the other supply chain entities are:
  - Transport route selection;
  - Provision of the cyanide safety management program for the entire cyanide supply chain through procedures and documented systems;

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WA Supply Chain

[Signature of Lead Auditor]  
27 May 2013
• Provision of cyanide specific training to road transport operators and rail loading/unloading personnel;
• Provision of a preventative maintenance program for cyanide isolators and seatchainers;
• Tracking of cyanide road and rail shipments throughout the supply chain to prevent losses, and;
• Provision and implementation of emergency response plans and resources throughout the entire supply chain.

In addition, the AGR cyanide production facility at Kwinana acts as the first component of the cyanide supply chain. AGR’s Kwinana facility includes the road and rail loading facilities for solution sodium cyanide using isolators and the loading of packaged solid sodium cyanide in seatchainers for road transport to the Fremantle port and the Kwinana rail siding.

**Aurizon (formerly QR National)** operates the rail network that receives solution sodium cyanide in CSBP owned isolators, from AGR’s Kwinana manufacturing facility for rail transport initially to the Forrestfield Rail Yard where trains are assembled for transport to the West Kalgoorlie rail facility. Solution sodium cyanide isolators are unloaded at the West Kalgoorlie facility for interim storage and transport by road to regional customers. Solid sodium cyanide is also loaded onto the Aurizon rail network using seatchainers from the AGR Kwinana manufacturing plant. The solid sodium cyanide seatchainers are then railed to the Forrestfield rail yard where trains are assembled for transport to the West Kalgoorlie rail facility for interim storage and distribution to regional customers. A due diligence investigation of compliance with the ICMI Transport Code of Practice was undertaken of the Aurizon (QR National) rail network by CSBP in March 2013.

**Coogee Chemicals** - Specialised Bulk Liquid Dangerous Goods Transport Division (Coogee) trucks receive solid sodium cyanide in seatchainers for road transport along approved routes to the Aurizon Kwinana rail siding for loading onto the rail network. Coogee also receives solution sodium cyanide in isolators for road transport to regional Western Australian customers along approved transport routes. Coogee may, under emergency situations, also transport both solution and solid sodium cyanide along approved contingency routes to the regional customers by road in the event that the rail network is not accessible.

**Toll Intermodal (formerly Mitchell Corp.)** transports solid sodium cyanide in seatchainers along an approved road route from AGR’s Kwinana manufacturing plant to the Aurizon Forrestfield Rail Terminal.

**Toll Mining Services (formerly Mitchell Corp.)** transports solution and solid sodium cyanide by road from the Aurizon West Kalgoorlie facility to regional customers.

**Qube Logistics (formerly P&O Trans Australia)** transports solid sodium cyanide in seatchainers along an approved road route from AGR’s Kwinana manufacturing plant to the Port of Fremantle for unloading prior to shipping.

**Patrick Terminals** (Patrick) operates stevedoring facilities at the Port of Fremantle and unloads solid sodium cyanide seatchainers from trucks for interim storage at a dedicated storage facility prior to loading onto ships for supply to overseas customers. A due diligence investigation of compliance with the ICMI Transport Code of Practice was undertaken of Patrick’s operations by CSBP in March 2013.

The AGR West Australian Supply Chain for Sodium Cyanide Transportation Distribution Network diagram developed during the audit is illustrated in Figure 1.
Figure 1: AGR WA Supply Chain – Sodium Cyanide Transportation Distribution Network
1.3. Audit Findings and Attestation

AGR West Australian Supply Chain is

☑ In full compliance with the International Cyanide Management Code
☐ in substantial compliance
☐ not in compliance

This Operation has not experienced compliance problems during the previous three-year audit cycle.

Audit Company:                            Michael Sputore & Associates Pty. Ltd
Date(s) of the Audit                      11th to 22nd March 2013 inclusive
Audit Team Leader:                         Michael Sputore
E-mail:                                   msa@linet.net.au
Names and Signatures of Other Auditors:   Santino Zanotti

27 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 and using standard and accepted practices for health, safety and environmental audits.

Signature of Lead Auditor:                 Michael Sputore

27 May 2013
2. AGR KWINANA

2.1. Operational Information

Name of Cyanide Transportation Facility: AGR Kwinana
Name of Facility Owner: Australian Gold Reagents Pty. Ltd.
Name of Facility Operator: CSBP Ltd
Name of Responsible Manager: Tony Kelly, Technical Support Manager – AGR Sodium Cyanide
Address: Kwinana Beach Road, Kwinana, Western Australia, Australia 6966
Telephone: (+61 8) 9411 8875
E-Mail: tony.kelly@csbp.com.au
Audit Protocol Employed: International Cyanide Management Institute, Cyanide Transportation Protocol, October 2009
www.cyanidecode.org

2.2. Audit Findings

☑ in full compliance with the International Cyanide Management Code

AGR Kwinana is
☐ in substantial compliance with
☐ not in compliance with

This finding is relevant to AGR’s activities in ensuring compliance of its cyanide carriers with the Code transport standards of practices, and its activities in cyanide loading and interim storage at the AGR Kwinana facility.

This operation has not experienced compliance problems during the previous three year audit cycle.

1. TRANSPORT: Transport cyanide in a manner that minimizes the potential for accidents and releases.

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

AGR Kwinana is
☑ in full compliance with Transport Practice 1.1
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:

AGR, through its transport consigner CSBP, has demonstrated that cyanide has been transported along recognized dangerous goods routes classified by the relevant authorities and in accordance with specific Western Australian transport approval conditions. These routes are selected and approved on the basis of minimizing the potential for accidents and release of cyanide and minimizes the potential impact of such events. The route selection and approvals process includes procedures to be in place for road transport times of operation and truck configurations. AGR requires contracted transporters to comply with its approved transport routes and cyanide transport procedures through specific contract conditions. AGR have continued to review the route and transport mode options every two years in accordance with the CSBP Cyanide Transport Management Plan and procedures. This review process includes consideration of feedback on route conditions provided by the transport operators and the outcomes of consultations with statutory regulators, emergency responders and other stakeholders. Ongoing assessment and review of transport routes are completed between the two year formal reviews when relevant
CSBP staff are commuting along cyanide transport routes for operational requirements. There have been no new routes introduced since the last audit.

**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 Transport Practice 1.2

  **AGR Kwinana is**
  - ☐ in substantial compliance with
  - ☐ not in compliance with

**Basis for this Finding:**

CSBP on behalf of AGR, has demonstrated that a comprehensive competency based awareness and emergency response training management program has been maintained for all transport modes and service contractors. The transport operators are required to meet the minimum competency standards and dangerous goods licensing requirements as stipulated in the Transport Management Plan and the Vehicle Operator's Handbook. Both of these documents are included in contract requirements for transporters for AGR. The transport operator training of new drivers includes induction onto the CSBP site, training in cyanide transport and awareness and assessment prior to accreditation by CSBP. This ensures continuous awareness of the Transport Management Plan and the Vehicle Operator's Handbook. CSBP maintains records of initial and refresher training undertaken and the appropriate driver accreditations. The driver training and refresher training of transport drivers forms an important Key Performance Indicator on all contracts between AGR and the transport companies. Although AGR/CSBP provides cyanide specific training to the transporters, heavy haulage and dangerous goods management training of operators is provided by the contracted transport companies in accordance with the minimum standards prescribed in the Transport Management Plan and the Vehicle Operators Handbook.

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

- ☑ in full compliance with Transport Practice 1.3

  **AGR Kwinana is**
  - ☐ in substantial compliance with
  - ☐ not in compliance with

**Basis for this Finding:**

The CSBP Transport Management Plan includes the use of purpose built isolators for the road and rail transport of liquid cyanide to AGR's Western Australian based customers. CSBP continues to maintain evidence that demonstrates compliance with its isolators certification and preventative maintenance program over the period since the last Code compliance audit. Solid cyanide is transported within approved IBC packaging which is transported within seaport. Evidence was sighted during the audit that the contract road transport providers employ vehicle operators, prime movers and trailers whose rated capacity is well within the loads they carry and are licensed and approved by the relevant authorities, consistent with the AGR contract requirements. The rail service provider Aurizon maintains a comprehensive Rail Safety Management System which includes procedures and manuals for equipment specifications and maintenance to ensure compliance with Western Australian Dangerous Goods Transport legislation. The contracts with road transport providers continue to specify that equipment must comply with dangerous goods transport applicable laws.

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

- ☑ in full compliance with Transport Practice 1.4

  **AGR Kwinana is**
  - ☐ in substantial compliance with
  - ☐ not in compliance with

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27 May 2013
Basis for this Finding:
The CSBP Transport Management Plan describes the responsibilities, roles and procedures relating to the safe handling and transport of cyanide. The Transport Management Plan includes minimum requirements for signage and placarding of cyanide loads. The Vehicle Operator’s Handbook requires comprehensive recorded inspections prior to each cyanide transport event. Cyanide load restraint requirements for transporters are prescribed in the Transport Management Plan and Vehicle Operators Handbook. Procedures are in place for modification or suspension of cyanide transport operations and shipment plans in response to inclement weather or civil unrest. Drug abuse prevention programs were observed to be in place for all cyanide transporters. All contract road transport providers continue to maintain heavy vehicle accreditation with the relevant authorities in relation to driver competency, preventative maintenance and fatigue management and were able to demonstrate robust preventive maintenance systems for their transport equipment. Aurizon maintains and continues to implement a comprehensive Rail Safety Management System which is subject to audits by CSBP for compliance with the CSBP Transport Management Plan. The rail transport operations maintain records that demonstrate continuous compliance with relevant statutory authority requirements, legislation and ICMI Code requirements. Compliance with relevant authorities and Western Australian Dangerous Goods Transport legislation is a CSBP transport service provider contract requirement. These regulatory safety obligations include measures that reflect the requirements of the ICMI Code for transport operations in regard to placarding, load restraint, inspection programs, driver fatigue and emergency/unplanned events. A review of cyanide transport safety incident reports verified that transport operators are continuing to report transport hazards and actions are taken to remove or minimize the safety risks posed by these hazards.

Transport Practice 1.5: Follow international standards for transportation of cyanide by sea and air.
☐ in full compliance with
☐ in substantial compliance with
☐ not in compliance with
☒ not applicable in relation to Transport Practice 1.5

Basis for this Finding:
Transportation by sea or air is not undertaken by AGR within Western Australia and therefore this transport practice was not assessed within the scope of the transportation recertification audit.

Transport Practice 1.6: Track cyanide shipments to prevent losses during transport.
☒ in full compliance with Transport Practice 1.6
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:
CSBP on behalf of AGR, has maintained shipping and handling records which demonstrate that cyanide deliveries are suitably reconciled with production and shipping quantities. Transport contractors maintain communication and tracking procedures in accordance with CSBP’s Transport Management Plan which includes the use of mobile phones, radios and real time GPS tracking systems. Rail locomotives are provided with mobile phones and radios and are tracked continuously by the train management and control centres. Communication blackout areas for mobile telephones have been identified for each transport route and suitable contingencies have been developed to address these limitations. Copies of the relevant Material Safety Data Sheets (MSDS) are included in the Vehicle Operator’s Handbook and must be carried in the driver’s cab at all times. CSBP undertakes regular audits of contractor compliance with the CSBP Transport Management Plan to monitor the implementation of cyanide tracking measures during shipping.
2. INTERIM STORAGE: Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.

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

☐ in full compliance with Transport Practice 2.1
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:
The operation at CSBP is a manufacturing operation and the storage of solid and liquid sodium cyanide prior to despatch is covered under the Cyanide Production Verification Protocol.

Interim storage of solid and liquid sodium cyanide is carried out at Aurizon West Kalgoorlie Container Interchange Terminal. A due diligence review by AGR and a visit and inspection by the auditors confirmed that Aurizon complied with all the requirements of Transport Practice 2.1.

Overnight storage of fully loaded liquid sodium cyanide isolatainers is undertaken at Toll mining Services Kalgoorlie in a dedicated bunded area. Inspection of this facility by the auditors confirmed compliance to the requirements of Transport Practice 2.1.

Temporary storage of sea containers prior to loading onto ships occurs at Patrick Terminals. A due diligence review by AGR of Patrick Terminals confirmed compliance to Transport Practice 2.1

3. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities.

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

☐ in full compliance with Transport Practice 3.1
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:
CSBP acting on behalf of AGR, is responsible for the overall management of the cyanide transportation activities including emergency response in accordance with the relevant statutory authorities and Ministerial approval conditions. These statutory emergency response requirements reflect ICM transport code requirements including consideration of route selection, mode of transport, interim storage, physical nature of the cyanide and the roles of external responders. The CSBP Transport Management Plan provides the emergency response plans of sufficient detail to meet the statutory obligations and is aligned to the Western Australian Hazardous Materials Management Plan (HAZM). The Transport Management Plan is supported by CSBP’s Management of Emergencies Procedure, Crisis Management Plan and the emergency procedures provided in the Vehicle Operator’s Handbook. Contracted transport service providers and external service provider roles and responsibilities in relation to emergency response are clearly stated in the Transport Management Plan. The plans have been reviewed and updated at least annually over the previous three years.

Transport Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response.

☐ in full compliance with Transport Practice 3.2
☐ in substantial compliance with
☐ not in compliance with

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Basis for this Finding:

CSBP has been accredited as Emergency Responder for sodium cyanide by the regulator, Department of Minerals and Petroleum. Specialised cyanide transport incident Emergency Response (ER) is provided throughout the supply chain by two dedicated CSBP response teams located at Kwinana. Training of the ER teams is provided by a combination of internal and external accredited personnel and mock drill exercises. Training records are available to demonstrate that the ER teams have maintained the required competencies since the previous Code compliance audit. CSBP also provides cyanide awareness and initial response training for all transport contractors except for Aurizon Forrestfield personnel who have their own ER training which is subject to CSBP due diligence reviews. Details of the roles, duties and responsibilities of ER personnel and the equipment requirements are described within the CSBP Transport Management Plan and related ER procedures. The ER response teams provide continuous response availability to all carriers in the supply chain and have access to a comprehensive range of emergency response equipment at AGR’s Kwinana production facilities. The CSBP Transport Management Plan includes a list of the available equipment at Kwinana, equipment provided with the transport vehicles and details of the ferrous sulphate stocks located strategically along the transport routes and at the interim storage facilities. ER for cyanide incidents at the Port of Fremantle is coordinated and directed by the Fremantle Port Authority using the Port’s ER plans. However, CSBP’s ER response teams provide technical support to the Port for cyanide related emergency scenarios.

Transport Practice 3.3: Develop procedures for internal and external emergency notification and reporting.

AGR Kwinana is

☐ in full compliance with Transport Practice 3.3
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:

CSBP has continued to maintain a dedicated emergency contact telephone number which reports direct to the Kwinana Emergency Control Centre (manned 24 hours, 365 days). This contact information is applicable throughout the supply chain and available to all the carriers within the supply chain through the Transport Management Plan and the Vehicle Operator’s Handbook. CSBP’s ER plans reflect the external reporting coordinated through the state HAZMAT plan. Controlled hard copy versions of the Management of Emergencies Manual, emergency response contact lists (including but not limited to AGR and CSBP management and emergency response personnel, port and customer mine site emergency personnel, and other response and contract transport personnel along the transport network) are maintained at the Kwinana Emergency Control and Response Centres. Emergency contact details are also provided within the CSBP Transport Management Plan and Vehicle Operator’s Handbook. CSBP have developed and maintain an intranet based electronic document management system within which document controlled versions of existing plans, procedures, forms, contact and checklists are available.

Transport Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

AGR Kwinana is

☐ in full compliance with Transport Practice 3.4
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:

The CSBP Transport Management Plan, provided to all carriers in the supply chain, includes procedures for the handling, containment, recovery, treatment, neutralisation and clean up for a range of liquid and solid cyanide scenarios associated with both road and rail transport.
This includes specific procedures in relation to the use of clean up chemicals for both surface water and underground water scenarios and includes the prohibition of sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface waters. The procedures have been revised periodically since the last Code compliance audit.

**Transport Practice 3.5:** Periodically evaluate response procedures and capabilities and revise them as needed.

☑ in full compliance with Transport Practice 3.5

AGR Kwinana is
☐ in substantial compliance with
☐ not in compliance with

*Basis for this Finding:*

The CSBP Transport Management Plan, which includes the emergency response plans, includes a commitment from AGR to undertake both external and internal audits of all carriers within the supply chain against the requirements of the Plan. Evidence exists that the Transport Management Plan and associated emergency response documents have previously been reviewed and updated. As required by the ministerial condition, Transport Management Plan audits are undertaken every two years including emergency response aspects by an independent external company. These audits have been completed for all carriers within the supply chain. The Transport Management Plan also includes a requirement for the planning, training and emergency exercises and a specific procedure exists for emergency scenario development and training. Cyanide emergency exercises (including outside responders and transport contractors as appropriate) are undertaken on a biannual basis with the recent cyanide emergency response exercises being conducted at the Aurizon West Kalgoorlie Terminal in June 2011, and at three mine sites since March 2011. CSBP maintains records of the emergency mock drill exercises which includes the exercise details, findings and applicable action items.
3. AURIZON

3.1. Operational Information

Aurizon Holdings Limited (Aurizon) offices are located in Perth Western Australia. Aurizon is a rail and road based freight transport company across Australia. The company was previously known as QR National.

Aurizon transports coal, iron ore and other minerals as well as agricultural and general freight.

Aurizon operates the daily rail service for dangerous goods between Kwinana, Perth and Kalgoorlie for servicing the mining and resources sector.

Aurizon operates the rail network that receives liquid sodium cyanide in CSBP owned isolainers, from AGR's Kwinana manufacturing facility for rail transport initially to the Forrestfield Rail Yard where trains are assembled for transport to the West Kalgoorlie rail facility. Liquid sodium cyanide isolainers are unloaded at the West Kalgoorlie facility for interim storage and transport by road to regional customers. Solid sodium cyanide is also loaded onto the Aurizon rail network using seatainers from the AGR Kwinana manufacturing plant. The solid sodium cyanide seatainers are then railed to the Forrestfield rail yard where trains are assembled for transport to West Kalgoorlie rail facility for interim storage and distribution to regional customers.

3.2. Summary of Due Diligence Investigation

A due diligence review of Aurizon's cyanide transport operations was completed by AGR in March 2013. It included a visit to Aurizon to undertake a physical visit, review documentation and interview appropriate personnel.

This due diligence report was reviewed by the audit team's transport technical auditor, who found that the operations of Aurizon had been comprehensively evaluated through the due diligence review. The scope of the due diligence review includes Aurizon's rail operations for both solid sodium cyanide, from the Kwinana freight terminal, and liquid sodium cyanide solution, from CSBP, to the West Kalgoorlie Container Terminal. The interim storage and loading at the West Kalgoorlie terminal was also reviewed.

Visits to the Aurizon Forrestfield Yard and Aurizon Container Interchange at Kalgoorlie was undertaken by the auditors to confirm key aspects of the due diligence review report.
4. COOGEE CHEMICALS

4.1. Operational Information

Coogee Chemicals - Specialised Bulk Liquid Dangerous Goods Transport Division (Coogee) is based in Kwinana Western Australia. Coogee provides transport services from the customer's operation or Coogee Chemicals' manufacturing facilities and tank terminals to the point of use. Coogee has a specialised fleet of dangerous goods road tankers and trailing equipment. The company services transport requirements throughout Western Australia. Coogee trucks receive solid sodium cyanide from AGR's Kwinana manufacturing facility in seatainers for road transport along approved routes to the Aurizon's Kwinana rail siding for loading onto the rail network and to Patrick Terminals at Fremantle Wharf. Coogee also receives liquid sodium cyanide from AGR's Kwinana manufacturing facility in isotainers for road transport to regional Western Australian customers along approved transport routes. Coogee may, under emergency situations, also transport both liquid and solid sodium cyanide along approved contingency routes to the regional customers in the event that the rail network is not accessible.

4.2. Audit Findings

☑ in full compliance with the International Cyanide Management Code
☐ in substantial compliance with
☐ not in compliance with

1. TRANSPORT: Transport cyanide in a manner that minimizes the potential for accidents and releases.

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

☑ in full compliance with Transport Practice 1.1
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:
The selection of road transport routes is undertaken by AGR in accordance with the requirement of the ICMI Transport Code (as described in 2.2.1 above). The route selection is carried out by AGR on behalf of all carriers within the supply chain.

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 Transport Practice 1.2
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:
CSBP on behalf of AGR, has demonstrated that a comprehensive competency based awareness and emergency response training management program has been maintained for all Coogee operators. AGR provides the cyanide and emergency response training components, while Coogee Chemicals are responsible for ensuring drivers hold appropriate heavy vehicle and dangerous goods carrier accreditations.

AGR Pty Ltd.
WA Supply Chain

Signature of Lead Auditor

27 May 2013
Transport Practice 1.3: Ensure that transport equipment is suitable for the cyanide shipment.

☑ in full compliance with Transport Practice 1.3

Coogee Chemicals is
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:
Coogee provides vehicle operators, prime movers and trailers for the transport of AGR owned and managed liquid sodium cyanide isolators and solid sodium cyanide seatainers. Evidence was sighted during the audit that Coogee employs vehicle operators, prime movers and trailers licensed and approved by the relevant authorities, consistent with the AGR contract requirements. The AGR contract with Coogee continues to specify that equipment must comply with dangerous goods transport applicable laws. These requirements include ICMI Transport Code obligations for transport equipment design and maintenance to be relevant to the loads being handled, procedures to verify the suitability of load bearing equipment and procedures to prevent overloading.

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

☑ in full compliance with Transport Practice 1.4

Coogee Chemicals is
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:
The CSBP Transport Management Plan describes the responsibilities, roles and procedures relating to the safe handling, temporary storage and transport of cyanide. CSBP undertakes audits of Coogee to determine compliance with the safety requirements of the Transport Management Plan and the Vehicle Operator’s Handbook. The audits verified that Coogee continues to maintain heavy vehicle accreditation with the relevant authorities in relation to driver competency, preventative maintenance and fatigue management. These audits also provide verification of continued compliance with the ICMI Transport Code requirements. A review of cyanide transport safety incident reports verified that Coogee is continuing to report transport hazards and actions are taken to remove or minimize the safety risks posed by these hazards.

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

☐ in full compliance with

Coogee Chemicals is
☐ in substantial compliance with
☐ not in compliance with
☑ not applicable in relation to Transport Practice 1.5

Basis for this Finding:
Transportation by sea or air is not undertaken by Coogee Chemicals within Western Australia and therefore this transport practice was not assessed within the scope of the recertification audit.

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

☑ in full compliance with Transport Practice 1.6

Coogee Chemicals is
☐ in substantial compliance with
☐ not in compliance with

AGR Pty Ltd.
WA Supply Chain

Signature of Lead Auditor

27 May 2013
Basis for this Finding:

CSBP on behalf of AGR, has maintained shipping and handling records which demonstrate that cyanide deliveries are suitably reconciled with production and shipping quantities. The requirement to return the Road Delivery Notes to CSBP as proof of delivery is a Key Performance Indicator in the transport contract. Coogee maintains communication and tracking procedures in accordance with CSBP’s Transport Management Plan which includes the use of mobile phones, radios and real time GPS tracking systems. Communication blackout areas for mobile telephones have been identified and suitable contingencies have been developed to address these limitations. Copies of the relevant MSDS are included in the Vehicle Operator’s Handbook and must be carried in the driver’s cab at all times. CSBP undertakes regular audits of Coogee compliance with the CSBP Transport Management Plan to monitor the implementation of cyanide tracking measures during shipping.

2. INTERIM STORAGE: Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.

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

☐ in full compliance with
☐ in substantial compliance with
☐ not in compliance with
☒ not applicable in relation to Transport Practice 2.1

Basis for this Finding:

Coogee does not operate a cyanide trans-shipping depot or interim storage site and therefore this transport practice was not assessed within the scope of the transportation recertification audit.

3. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities.

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

☒ in full compliance with Transport Practice 3.1

☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:

CSBP acting on behalf of AGR, is responsible for the development of detailed emergency response plans (as described in section 2.2.3) for Coogee Chemicals transport operations. Coogee roles and responsibilities in relation to emergency response are clearly stated in the CSBP Transport Management Plan.

Transport Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response.

☒ in full compliance with Transport Practice 3.2

☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:

Specialised cyanide transport incident Emergency Response for Coogee operated cyanide transport is provided by two dedicated CSBP response teams located at Kwinana. CSBP also provides cyanide awareness and initial response training for all transport contractors including Coogee.
Transport Practice 3.3: Develop procedures for internal and external emergency notification and reporting.

☒ in full compliance with Transport Practice 3.3
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:
Emergency response, contact and reporting procedures are provided within the CSBP Transport Management Plan and the Vehicle Operator’s Handbook which Coogee drivers are trained in and use for all cyanide transport operations.

Transport Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

☒ in full compliance with Transport Practice 3.4
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:
Coogee transport operators are trained to respond to cyanide incidents in accordance with the CSBP Transport Management Plan which includes procedures for the handling, containment, recovery, treatment, neutralization and clean up for a range of liquid and solid cyanide scenarios associated with road transport.

Transport Practice 3.5: Periodically evaluate response procedures and capabilities and revise them as needed.

☒ in full compliance with Transport Practice 3.5
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:
The periodic evaluation and review of the CSBP Transport Management Plan is undertaken by AGR. Coogee is not responsible for this requirement.
5. TOLL INTERMODAL & TOLL MINING SERVICES

5.1. Operational Information

Toll Intermodal and Toll Mining Services has offices and transport depots in Perth and Kalgoorlie and are part of the Australia wide Toll Group. Toll Intermodal and Toll Mining Services offer specialised transport services for dangerous goods. The company's bulk logistics focuses specifically in the energy, resources and dangerous goods industries.

Toll Mining Services transports liquid and solid sodium cyanide by road from the ARG West Kalgoorlie facility to regional customers. Toll Intermodal transports solid sodium cyanide in seateainers from AGR's Kwinana manufacturing facility for transport to the Marshalling Yards at Kewdale for transfer on to Pacific National Rail for transport to Eastern States customers.

5.2. Audit Findings

☑ in full compliance with the International Cyanide Management Code
☐ in substantial compliance with
☐ not in compliance with

1. TRANSPORT:  

Transport cyanide in a manner that minimizes the potential for accidents and releases.

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

☑ in full compliance with Transport Practice 1.1
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:
The selection of road transport routes is undertaken by AGR in accordance with the requirement of the ICMI Transport Code (as described in 2.2.1 above). The route selection is carried out by AGR on behalf of all carriers within the supply chain.

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 Transport Practice 1.2
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:
CSBP on behalf of AGR, has demonstrated that a comprehensive competency based awareness and emergency response training management program has been maintained for all Toll Intermodal and Toll mining Services operators. AGR provides the cyanide and emergency response training components, while Toll Intermodal and Toll Mining Services are responsible for ensuring drivers hold appropriate heavy vehicle and dangerous goods carrier accreditations. The operator training includes induction of new drivers to ensure continuous awareness of the Transport Management Plan and the Vehicle Operator's Handbook. CSBP maintains records of initial and refresher training undertaken and the appropriate driver accreditations. Dangerous goods management training has continued to be a core requirement for all Toll Intermodal and Toll Mining Services operators.
Transport Practice 1.3: Ensure that transport equipment is suitable for the cyanide shipment.

☑ in full compliance with Transport Practice 1.3
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:
Toll provides vehicle operators, prime movers and trailers for the transport of AGR owned and managed liquid sodium cyanide isotainers and solid sodium cyanide seatainers. There was evidence that Toll employs vehicle operators, prime movers and trailers licensed and approved by the relevant authorities, consistent with the AGR contract requirements. The AGR contract with Toll continues to specify that equipment must comply with dangerous goods transport applicable laws. These requirements include ICMI Transport Code obligations for transport equipment design and maintenance to be relevant to the loads being handled, procedures to verify the suitability of load bearing equipment and procedures to prevent overloading.

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

☑ in full compliance with Transport Practice 1.4
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:
The CSBP Transport Management Plan describes the responsibilities, roles and procedures relating to the safe handling, temporary storage and transport of cyanide. CSBP undertakes audits of Toll to determine compliance with the safety requirements of the Transport Management Plan and the Vehicle Operator's Handbook. The audits verified that Toll Intermodal and Toll Mining Services continue to maintain heavy vehicle accreditation with the relevant authorities in relation to driver competency, preventative maintenance and fatigue management. These audits also provide verification of continued compliance with the ICMI Transport Code requirements. A review of cyanide transport safety incident reports verified that Toll Intermodal and Toll Mining Services is continuing to report transport hazards and actions are taken to remove or minimize the safety risks posed by these hazards.

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

☐ in full compliance with
☐ in substantial compliance with
☐ not in compliance with
☑ not applicable in relation to Transport Practice 1.5

Basis for this Finding:
Transportation by sea or air is not undertaken by Toll Intermodal or Toll Mining Services within Western Australia and therefore this transport practice was not assessed within the scope of the recertification audit.

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

☑ in full compliance with Transport Practice 1.6
☐ in substantial compliance with
☐ not in compliance with

AGR Pty Ltd.
WA Supply Chain

[Signature or Lead Auditor]

27 May 2013
Basis for this Finding:

CSBP on behalf of AGR, has maintained shipping and handling records which demonstrate that cyanide deliveries are suitably reconciled with production and shipping quantities. The requirement to return the Road Delivery Notes to CSBP as proof of delivery is a Key Performance Indicator written into the transport contract. Toll Intermodal and Toll Mining Services maintains communication and tracking procedures in accordance with CSBP’s Transport Management Plan which includes the use of mobile phones, radios and real time GPS tracking systems. Communication blackout areas for mobile telephones have been identified and suitable contingencies have been developed to address these limitations. Copies of the relevant MSDS are included in the Vehicle Operator’s Handbook and must be carried in the driver’s cab at all times. CSBP undertakes regular audits of Toll Intermodal and Toll Mining Services compliance with the CSBP Transport Management Plan to monitor the implementation of cyanide tracking measures during shipping.

2. INTERIM STORAGE: Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.

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

☑ in full compliance with Transport Practice 2.1

Toll is
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:

There is no interim storage conducted at Toll Intermodal Marshalling Yards at Kewdale.

Toll Mining Services West Kalgoorlie yard incorporates a dedicated concrete lined cyanide trans-shipping pad to be used in situations where a truck has picked up liquid cyanide isolators from Aurizon’s West Kalgoorlie storage facility and is awaiting a new operator to transport the isolators to one of the regional customer sites. The concrete lined pad is located in a secure area with adequate signage and is constructed in such a manner that any leakage from an isolator is captured in a central concrete lined sump.

3. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities.

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

☑ in full compliance with Transport Practice 3.1

Toll is
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:

CSBP acting on behalf of AGR, is responsible for the development of detailed emergency response plans (as described in section 2.2.3) for Toll Intermodal and Toll Mining Services transport operations. Toll Intermodal and Toll Mining Services roles and responsibilities in relation to emergency response are clearly stated in the CSBP Transport Management Plan.

Transport Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response.

☑ in full compliance with Transport Practice 3.2

Toll is
☐ in substantial compliance with
☐ not in compliance with

AGR Pty Ltd.
WA Supply Chain

Signature of Lead Auditor 27 May 2013
Basis for this Finding:
Specialised cyanide transport incident Emergency Response for Toll Intermodal and Toll Mining Services operated cyanide transport is provided by two dedicated CSBP response teams located at Kwinana. CSBP also provides cyanide awareness and initial response training for all transport contractors including Toll Intermodal and Toll Mining Services.

Transport Practice 3.3: Develop procedures for internal and external emergency notification and reporting.
☑ in full compliance with Transport Practice 3.3
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:
Emergency response, contact and reporting procedures are provided within the CSBP Transport Management Plan and the Vehicle Operator’s Handbook which Toll Intermodal and Toll Mining Services drivers are trained in and use for all cyanide transport operations.

Transport Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.
☑ in full compliance with Transport Practice 3.4
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:
Toll transport operators are trained to respond to cyanide incidents in accordance with the CSBP Transport Management Plan which includes procedures for the handling, containment, recovery, treatment, neutralization and clean up for a range of liquid and solid cyanide scenarios associated with road transport.

Transport Practice 3.5: Periodically evaluate response procedures and capabilities and revise them as needed.
☑ in full compliance with Transport Practice 3.5
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:
The periodic evaluation and review of the CSBP Transport Management Plan is undertaken by AGR. Toll is not responsible for this requirement.
6. QUBE LOGISTICS

6.1. Operational Information

Qube Logistics is an Australian national operator offering complete port logistics services across Australia. Qube Logistics operations supporting AGR are located at the Port of Fremantle. The company specialises in port service logistics by providing port containerised transport. These logistic services are part of the coordinated service between the exporter and the stevedoring companies and shipping lines.

Qube Logistics transports solid sodium cyanide in seatainers along an approved road route from AGR’s Kwinana manufacturing plant to the Port of Fremantle for unloading prior to shipping.

6.2. Audit Findings

☑ In full compliance with the International Cyanide Management Code
☐ in substantial compliance with
☐ not in compliance with

1. TRANSPORT: Transport cyanide in a manner that minimizes the potential for accidents and releases.

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

☑ in full compliance with Transport Practice 1.1
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:

The selection of road transport routes is undertaken by AGR in accordance with the requirement of the ICMI Transport Code (as described in 2.2.1 above). The route selection is carried out by AGR on behalf of all carriers within the supply chain.

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 Transport Practice 1.2
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:

CSBP on behalf of AGR, has demonstrated that a comprehensive competency based awareness and emergency response training management program has been maintained for all Qube Logistics operators. AGR provides the cyanide and emergency response training components, while Qube Logistics is responsible for ensuring drivers hold appropriate heavy vehicle and dangerous goods carrier accreditations. The operator training includes induction of new drivers to ensure continuous awareness of the Transport Management Plan and the Vehicle Operator’s Handbook. CSBP maintains records of initial and refresher training undertaken and the appropriate driver accreditations. Dangerous goods management training has continued to be a core requirement for all Qube Logistics operators.
Transport Practice 1.3: Ensure that transport equipment is suitable for the cyanide shipment.

☑ in full compliance with Transport Practice 1.3

Qube Logistics is
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:
Solid cyanide is transported within approved IBC packaging which is transported within seatabiners. Evidence was sighted during the audit that Qube Logistics employs vehicle operators, prime movers and trailers licensed and approved by the relevant authorities, consistent with the AGR contract requirements. The AGR contract with Qube Logistics continues to specify that equipment must comply with dangerous goods transport applicable laws. These requirements include ICMI Transport Code provisions for transport equipment design and maintenance to be relevant to the loads being handled, procedures to verify the suitability of load bearing equipment and procedures to prevent overloading.

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

☑ in full compliance with Transport Practice 1.4

Qube Logistics is
☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:
The CSBP Transport Management Plan describes the responsibilities, roles and procedures relating to the safe handling and transport of cyanide. CSBP undertakes audits of Qube Logistics to determine compliance with the safety requirements of the Transport Management Plan and the Vehicle Operator’s Handbook. The audits verified that Qube Logistics continues to maintain heavy vehicle accreditation with the relevant authorities in relation to driver competency, preventative maintenance and fatigue management. These audits also provide verification of continued compliance with the ICMI Transport Code requirements. A review of cyanide transport safety incident reports verified that Qube Logistics is continuing to report transport hazards and actions are taken to remove or minimize the safety risks posed by these hazards.

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

☐ in full compliance with
☐ in substantial compliance with
☐ not in compliance with
☑ not applicable in relation to Transport Practice 1.5

Basis for this Finding:
Transportation by sea or air is not undertaken by Qube Logistics within Western Australia and therefore this transport practice was not assessed within the scope of the recertification audit.

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

☑ in full compliance with Transport Practice 1.6

Qube Logistics is
☐ in substantial compliance with
☐ not in compliance with
Basis for this Finding:

CSBP on behalf of AGR, has maintained shipping and handling records which demonstrate that cyanide deliveries are suitably reconciled with production and shipping quantities. Qube Logistics maintains communication and tracking procedures in accordance with CSBP’s Transport Management Plan which includes the use of mobile phones, radios and real time GPS tracking systems.

2. INTERIM STORAGE: Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.

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

☐ in full compliance with
☐ in substantial compliance with
☐ not in compliance with
☑ not applicable in relation to Transport Practice 2.1

Basis for this Finding:

Qube Logistics does not operate a cyanide trans-shipping depot or interim storage site and therefore this transport practice was not assessed within the scope of the recertification audit.

3. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities.

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

☑ In full compliance with Transport Practice 3.1

☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:

CSBP acting on behalf of AGR, is responsible for the development of detailed emergency response plans (as described in section 2.2.3) for Qube Logistics transport operations. Qube Logistics roles and responsibilities in relation to emergency response are clearly stated in the CSBP Transport Management Plan.

Transport Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response.

☑ In full compliance with Transport Practice 3.2

☐ in substantial compliance with
☐ not in compliance with

Basis for this Finding:

Specialised cyanide transport incident Emergency Response for Qube Logistics operated cyanide transport is provided by two dedicated CSBP response teams located at Kwinana. CSBP also provides cyanide awareness and initial response training for all transport contractors including Qube Logistics.
Transport Practice 3.3: Develop procedures for internal and external emergency notification and reporting.

☑ in full compliance with Transport Practice 3.3

☐ in substantial compliance with

☐ not in compliance with

Basis for this Finding:

Emergency response, contact and reporting procedures are provided within the CSBP Transport Management Plan and the Vehicle Operator’s Handbook which Qube Logistics drivers are trained in and use for all cyanide transport operations.

Transport Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

☑ in full compliance with Transport Practice 3.4

☐ in substantial compliance with

☐ not in compliance with

Basis for this Finding:

Qube Logistics transport operators are trained to respond to cyanide incidents in accordance with the CSBP Transport Management Plan which includes procedures for the handling, containment, recovery, treatment, neutralization and clean up for a range of liquid and solid cyanide scenarios associated with road transport.

Transport Practice 3.5: Periodically evaluate response procedures and capabilities and revise them as needed.

☑ in full compliance with Transport Practice 3.5

☐ in substantial compliance with

☐ not in compliance with

Basis for this Finding:

The periodic evaluation and review of the CSBP Transport Management Plan is undertaken by AGR. Qube Logistics is not responsible for this requirement.
7. PATRICK TERMINALS

7.1. Operational Information

Patrick Terminals (Patrick) is one of Australia's leading providers of port related services to importers, exporters and shipping lines. Patrick's business is the provision of ship to shore and shore to door for both domestic and international trade markets. Patrick is part of Asciano Limited a publicly listed company on the Australian Stock Exchange. Patrick at Fremantle Port Western Australia provides container handling from shore to ship for the export of AGR's solid sodium cyanide.

Patrick operates stevedoring facilities at the Port of Fremantle and unloads solid sodium cyanide seatainers from trucks for interim storage at a dedicated storage facility prior to loading onto ships for supply to overseas customers. A due diligence investigation of compliance with the ICMI Transport Code of Practice of Patrick's operations was completed by AGR in March 2013.

7.2. Summary of Due Diligence Investigation

The March 2013 due diligence report undertaken by AGR on Patrick's activities included temporary storage of hazardous materials, emergency response, and compliance with statutory requirements.

The due diligence assessment consisted of a visit by AGR/CSBP personnel to Patrick Terminal Fremantle to undertake a physical visit, review documentation and interview appropriate personnel.

A review of the report undertaken by the audit team's transport technical expert, found the AGR due diligence report to be a comprehensive evaluation of Patrick's cyanide temporary storage and loading activities.