



June 2015

INTERNATIONAL CYANIDE MANAGEMENT CODE TRANSPORT CERTIFICATION AUDIT

Alistair James Company Ltd (Alistair Logistics) Transportation Certification Summary Audit Report

Submitted to:

International Cyanide Management Institute
1400 I Street, NW, Suite 550
WASHINGTON DC 20005
UNITED STATES OF AMERICA

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Via email:
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REPORT



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1.0 INTRODUCTION

1.1 Operational Information

Name of Transportation Facility:	Alistair James Company Ltd
Name of Facility Owner:	Not Applicable
Name of Facility Operator:	Alistair Logistics
Name of Responsible Manager:	Roger Crawford, Head of Mining Services
Address:	Alistair Logistics PO Box 4546
State/Province:	Dar es Salaam
Country:	Tanzania
Telephone:	+255 762 745 590
Fax:	Not Applicable
Email:	roger.crawford@alisticgroup.com

1.2 Description of Operation

1.2.1 Alistair Logistics

Alistair Logistics is part of Alistair James Company Ltd (Also referred to as Alistair Group) and is headquartered in Dar es Salaam, Tanzania, with offices in Mtwara, Tanzania and Pemba, Mozambique. Alistair Logistics provides transport of cargo from Dar es Salaam port to the neighbouring countries of East, Central and Southern Africa. Alistair Logistics is the transport services to a variety of clients in the oil and gas, mining and freight forwarding industries.

Using the combination of a reliable fleet of tractors and trailers, innovative tracking technology to monitor vehicles and highly trained personnel, Alistair Logistics provides an efficient transport service and adheres to international standards throughout East Africa. Alistair James Company Ltd is an ICMC signatory.

1.2.2 Transit Storage

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol.

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. Following collection from the Port, containers may be temporarily stored on trailers as the Alistair Logistics overnight in preparation for departure to the customer mine sites the following morning. At no stage is cyanide removed from the trucks or containers prior to unloading at customer mine sites.



1.3 Auditors Findings and Attestation

Alistair Logistics is: in full compliance with **Cyanide Management Code**
 in substantial compliance with
 not in compliance with

Audit Company: Golder Associates Pty Ltd
Audit Team Leader: Mike Woods, Exemplar Global (113792)
Email: mwoods@golder.com.au

1.4 Name and Signatures of Other Auditors:

Name	Position	Signature	Date
Mike Woods	Lead Auditor and Technical Specialist		3 June 2015

1.5 Dates of Audit

The Certification Transport Audit of Alistair Logistics was undertaken over two days between 13 and 14 January 2015.

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 Cyanide Verification Protocol for Cyanide Transportation Operations* and using standard and accepted practices for health, safety and environmental audits.

Alistair Logistics  3 June 2015
Name of Facility Signature of Lead Auditor Date



2.0 CONSIGNOR SUMMARY

2.1 Principle 1 - Transport

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

2.1.1 Transport Practice 1.1

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

in full compliance with

Alistair Logistics is

in substantial compliance with

Transport Practice 1.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Alistair Logistics is in FULL COMPLIANCE with Transport Practice 1.1 requiring the transport of cyanide in a manner that minimises the potential for accidents and releases.

Alistair Logistics has developed and implemented a management system. The developed Cyanide Transport Management Plan (CTMP) provides the guidance to the management of cyanide transport at Alistair Logistics supported by a *procedure for selecting, risk assessing and re-evaluating cyanide transport routes*. The CTMP outlines the measures to be undertaken during transport including escorts, convoys and speed reduction.

Alistair Logistics has implemented a *procedure for selecting, risk assessing and re-evaluating cyanide transport routes* to evaluate the risks of selected cyanide transport routes and take the measures necessary to manage these risks. The route assessment covers the port of entry to the mine site and includes measures to address identified risks. The procedure considers population density, infrastructure, pitch and grade and environmental factors such as water bodies and fog along the route. The procedure is supplemented by the CTMP and the en-route assessment carried out by the driver and convoy leader

Alistair Logistics drives the route to the customer collecting information on the route conditions and then considers the risk associated with hazards and features identified along the route prior to undertaking transport of cyanide. The route assessments are documented and retained on the operations *Project Place* online document system.

Alistair Logistics has demonstrated implementation of the route selection and assessment process by completing risk assessments for a number of transport routes which have been recorded electronically with notes and photographs of hazards that have been identified and assessed along the route.

The *procedure for selecting, risk assessing and re-evaluating cyanide transport routes* does provide for periodic re-evaluation of routes used and a process for getting feedback on route condition from the drivers and convoy leaders. Complete convoy feedback forms were observed for trip number 11001313.

Alistair Logistics seeks input from communities, other stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures. The *procedure for selecting, risk assessing and re-evaluating cyanide transport routes* details that discussions should include:

...stakeholders concerns, outline spill control mechanisms, logistics for emergency response, response to poisoning, response to an accident, evacuation.

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Alistair Logistics has demonstrated input from communities, other stakeholders and applicable governmental agencies by providing completed route assessments displaying stakeholder contact details. The Head of Mining completed the assessments including consultation with the listed stakeholders.

Where routes present special safety or security concerns, Alistair Logistics has adopted higher level security arrangements for all cyanide convoys. The Head of Mining Division detailed that security measures including escorts for convoys, special locks and constant GPS tracking as standard for the operation. Section 4 of CTMP details the standard security measures and lists the convoy process and the role of the Convoy Leader. Implementation of the GPS system was observed during the audit.

Consultation with stakeholders is undertaken through the route assessment process and the names and contact details for those consulted that have or may have to be notified of an incident are provided in the *Cyanide Transport Emergency Contact List*. The Head of Mining completes the route assessment and is responsible for the consultation with identified responders.

Alistair Logistics does not currently subcontract handling or transportation of cyanide.

2.1.2 Transport Practice 1.2

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

in full compliance with

Alistair Logistics is

in substantial compliance with

Transport Practice 1.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Alistair Logistics only use trained, qualified and licensed operators to operate its transport vehicles. Drivers must hold a valid Tanzanian Driver’s license for the class of vehicle and have completed the defensive driver training and cyanide awareness training to undertake cyanide deliveries.

Personnel operating cyanide handling and transport equipment have been trained to perform their jobs in a manner that minimises the potential for cyanide releases and exposures. Alistair Logistics only transports solid cyanide in sealed shipping containers that are placed on the trucks by port operators and removed by the mine. Each driver completes the Drivers Cyanide Awareness Training.

A review of the prepared Drivers Cyanide Awareness Training material identified that it covers:

- Cyanide properties and hazards including:
 - Intermediate bulk container (IBC) packaging
 - Exposure routes and first aid
 - Placards
 - PPE.

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- Convoy Rules including:
 - Responsibilities of Escort and Leaders
 - Driving limits and fitness for work.
- Emergency Response including:
 - Actions
 - Case studies, solid, roll over, vehicle fire.
- Assessment.

Convoy Leaders and Operations personnel complete the advance cyanide Training. Training records were observed for Alistair Logistics's personnel completing Drivers Cyanide Awareness Training and Advanced Cyanide Awareness Training.

Alistair Logistics does not currently subcontract handling or transportation of cyanide.

2.1.3 Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

in full compliance with

Alistair Logistics is

in substantial compliance with

Transport Practice 1.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Alistair Logistics uses equipment designed and maintained to operate within the loads it will be handling when transporting cyanide. Alistair Logistics has a fleet of prime movers (either Sino or Iveco) and trailers that are rated to a load of 40 tonnes. The CTMP details that each truck and trailer unit carries one shipping container with cyanide IBCs at approximately 26 tonnes, well within the design load.

Alistair Logistics has implemented a preventative maintenance and inspections system to maintain that vehicles and trailers include pre and post shipment inspections and regular servicing.

Maintenance records for equipment involved in recent shipments were found to be available and complete. Vehicles were observed to be inspected and maintenance activities in process during the site visit.

Alistair Logistics has implemented procedures to verify the adequacy of the equipment for the load it must bear. The *Truck/Trailer Inspection Checklist* includes a visual inspection of the truck and trailer. The trailer inspection includes an assessment of the condition of floor and chassis, lights, legs, jacking, springs, brake booster, axels, roller joinings, wheels, locking lugs.

The *Container Tracking Slip 001*, includes a requirement to list the weight, ISO number, C.A.Z number and DG or UN Number. It also includes an inspection of container integrity.

The *Container Checking Slip 002*, includes a visual inspection of container condition.

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There are procedures in place to prevent overloading of the transport vehicle being used for handling cyanide. The CTMP details the general requirements for convoys including the requirement of only one container of cyanide will be loaded onto each truck. A single container is within the rated loading of the transport vehicle.

The documentation retained following a cyanide delivery to Nomoya, DRC, 15 December 2014 Document Package included:

- GCLA Permit
- Completed Container Tracking Checklists
 - MSKU 446408-9
 - MSKU 779748-4
 - MSKU 675717-7
 - MSKU542197-0
 - PONU-037191-7.
- Route Conditions Feedback Form 24 December 2014
- Cyanide Convoy Feedback Form: 11001313, 30 December 2014
- Alcohol Testing Records.

Alistair Logistics retains a file for each destination and retains the completed checklists and forms for each delivery. A review of the approved destinations for delivery shows the transporter has implemented their system in accordance with the procedures.

Alistair Logistics does not currently subcontract handling or transportation of cyanide.

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2.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

in full compliance with

Alistair Logistics is

in substantial compliance with

Transport Practice 1.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Alistair Logistics is in FULL COMPLIANCE with Transport Practice 1.4 requiring the operation develop and implement a safety programme for transport of cyanide.

Alistair Logistics has implemented procedures to ensure that the cyanide is transported in a manner Alistair Logistics has implemented procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging.

- The CTMP requires the fitting of sliding locks at the time they are received from the port and only removed at the time of delivery.
- The Container Tracking Checklist includes in section 2.0 a check for seals and requires the check to be completed two times per day.

Alistair Logistics uses placards or other signage to identify the shipment as cyanide, as required by local regulations and international standards.

Vehicle placarding consists of the following:

- One Emergency Information Panel (EIP) as described above is placed on one long side of the container. This is done by Orica.
- One EIP is placed on the rear of the container so that it is visible from the rear.
- One Class 6 dangerous goods class diamond shaped label placed on the front of the vehicle.

Convoy Leaders are required to check that this signage is in place prior to departure.

Alistair Logistics has implemented a safety program for cyanide transport that includes (where appropriate or applicable) the following:

a) *Vehicle inspections prior to each departure/shipment.*

Vehicle inspections of the trucks, trailers and escort vehicles are completed by the drivers prior to each shipment. A review of recent deliveries and interview with personnel confirmed that inspections are completed prior to each shipment for the vehicles involved.

b) *A preventative maintenance program.*

The operation has an established preventative maintenance program that involves regular inspections and maintenance by qualified mechanics. The operation uses an electronic fleet maintenance program to track and schedule preventative maintenance activities. A review of maintenance records and maintenance schedule confirmed that the operation has implemented a preventative maintenance program.

c) *Limitations on operator or drivers' hours.*

The operation has set a limit of 13 hours for drivers and this is further restricted to day time operations. Overnight driving is not permitted.

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d) *Procedures to prevent loads from shifting.*

The operation transports full shipping containers that are locked and sealed. The containers are secured to the vehicle using 4 container twist locks that are integral to the trailer.

e) *Procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered.*

The CTMP provides the procedures by which transportation can be modified or suspended. This is undertaken in consultation with the operations manager, head of mining and convoy leader.

f) *A drug abuse prevention program.*

Alistair Logistics has developed a substance abuse policy covering alcohol and drugs that includes provisions for random and for cause testing. The CTMP also provides rules for convoys including prohibiting alcohol consumption. Alcohol testing is completed daily on each morning of the delivery.

Training is provided through the induction process on company standards and a breathalyser for alcohol is being installed at the company depot.

g) *Retention of records documenting that the above activities have been conducted.*

The operation retains a file for each destination and retains the completed checklists and forms for each delivery. A review of the approved destinations for delivery shows the transporter has implemented their system in accordance with the procedures.

Alistair Logistics does not currently subcontract handling or transportation of cyanide.

2.1.5 Transport Practice 1.5

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

in full compliance with

Alistair Logistics is

in substantial compliance with

Transport Practice 1.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Standard of Practice 1.5 requiring the operation to follow international standards for transportation of cyanide by sea and air is NOT APPLICABLE to Alistair Logistics.

Alistair Logistics does not intend to transport consignments of cyanide by sea or air within the scope of this audit.

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2.1.6 Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

in full compliance with

Alistair Logistics is

in substantial compliance with

Transport Practice 1.6

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Alistair Logistics transport vehicles do have a means to communicate with the transport company, the mining operation, the cyanide producer or distributor and/or emergency responders.

Each convoy has a satellite phone, mobile phones and radio for communication. In addition the convoys are tracked via an electronic real time tracking system. The GPRS tracking is supplemented by Iridium satellite tracking in the escort vehicles in areas where GPRS coverage is not available.

Alistair Logistics does periodically testing their communication equipment, mobile phone and radio to ensure it functions properly. Checks on the equipment are undertaken as part of the pre-departure checks.

Alistair Logistics has implemented procedures to manage mobile phone blackout areas along the transport route. These are managed by the use of a convoy and via the supply of satellite phones to the escort personnel.

Alistair Logistics utilise an online tracking system and each convoy is monitored by a fleet manager. The online tracking system is called skyline and provides real time information on the location of the vehicle, whether the vehicle engine is running or not, whether it is moving or stationary and for how long. This information is provided for each vehicle and can be accessed by the fleet manager and operations manager via the main system or mobile phone application. The system has also been enabled to send alerts for unscheduled stops or departures from routes.

Alistair Logistics implements inventory controls and/or chain of custody documentation to prevent loss of cyanide during shipment. Inventory controls include unique seals number on each container linked to the bill of lading and additional physical security locks applied prior to depart from the Port. The seals are recorded and checked as part of the deliver documentation for each convoy.

Alistair Logistics has shipping records indicating the amount of cyanide in transit and Materials Safety Data Sheets with cyanide shipments. Shipping records indicating the amount of cyanide in transit and Material Safety Data Sheets are available during transport. Each shipment has a government permit that details the amount of cyanide and this is reflected in the convoy records. Material safety data sheets are carried by the escort drivers in both English and Swahili.

Alistair Logistics does not currently subcontract handling or transportation of cyanide.

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2.2 Principle 2 - Interim Storage

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

2.2.1 Transport Practice 2.1

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

in full compliance with

Alistair Logistics is

in substantial compliance with

Transport Practice 2.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Transport Practice 2.1 requiring transporters design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures is NOT APPLICABLE to Alistair Logistics.

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. Following collection from the Port, containers may be temporarily stored on trailers as the Alistair Logistics overnight in preparation for departure to the customer mine sites the following morning. At no stage is cyanide removed from the trucks or containers prior to unloading at customer mine sites.

2.3 Principle 3 - Emergency Response

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

2.3.1 Transport Practice 3.1

Prepare detailed Emergency Response Plans for potential cyanide releases.

in full compliance with

Alistair Logistics is

in substantial compliance with

Transport Practice 3.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Alistair Logistics has develop and implement an Emergency Response Plan. The emergency response plan is part of the Cyanide Transport Management Plan (CTMP) and contains response actions, spill scenarios and responsibilities.

The CTMP is appropriate for the selected transportation routes and there are no interim storage facilities. The CTMP considers spill scenarios and incidents involving fires, spillage and handling wet cyanide. This combined with the route risk assessments provides route specific response actions.

The CTMP does consider the physical and chemical form of cyanide. The CTMP has been developed for solid sodium cyanide which is the only form of cyanide transported. The CTMP does consider liquid cyanide spills should solid cyanide come into contact with water.

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The CTMP does consider the method of transport. The CTMP is specific to the road transport of cyanide in IBCs within shipping containers. Alistair Logistics does not transport other forms of cyanide or use other methods of transport.

The CTMP does consider the transport infrastructure from the port to the mine site. The route risk assessments encompass the pick-up and delivery which includes port and road infrastructure. Cyanide is not collected from railways or transported by rail.

The CTMP does consider the design of the shipping container and wooden IBCs. This is considered in the spill response guides and description of material transported. The CTMP does address spill inside the shipping container and decontamination arrangements.

The CTMP does include descriptions of response actions, as appropriate for the anticipated emergency situation. The CTMP contains a series of response guides to identified emergency situations that provide response actions. The CTMP also provides roles and responsibilities applicable to the management of emergencies and specific roles in the management of emergencies.

The CTMP does identify the roles of outside responders, medical facilities or communities in emergency response procedures. The CTMP reflects the general responsibilities of outside responders and medical facilities and the role the police take in emergency situations.

2.3.2 Transport Practice 3.2

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

in full compliance with

Alistair Logistics is

in substantial compliance with

Transport Practice 3.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Alistair Logistics does provide emergency response training to appropriate personnel. Convoy Leaders, Operations Personnel and drivers are trained in emergency response procedures through the cyanide awareness training package and through mock emergency exercises.

Alistair Logistics has procedures to describe the specific emergency response duties and responsibilities of personnel. The CTMP provides descriptions of the specific emergency response duties and responsibilities of personnel. Section 7 provides authorisation to activate the plan and Section 8 details responsibilities including the following personnel:

- Convoy Leader
- ER Escort Drivers
- Truck Drivers
- Communications Officer
- Record Keeper
- Local Authorities

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- Contact One
- Head of Mining
- Managing Director
- Fleet Coordinator.

Alistair Logistics does include in the CTMP a list of all emergency response equipment that should be available during transport or along the transportation route. A list of all emergency response equipment that should be available during transport or along the transportation route contained in the Cyanide Transport Management Plan. Alistair Logistics has developed checklists for the equipment that are to be carried by the escort vehicles as required by the CTMP. The checklists address the cyanide spill response equipment and general spill response equipment along with HCN detectors and communications equipment.

Alistair Logistics does have available the necessary emergency response and health and safety equipment, including personal protective equipment during transport. A site inspection of the emergency response vehicle confirmed that equipment listed on the checklists was available and HCN monitors and satellite phones were available from the operations centre.

A review of completed delivery documentation for completed convoys shows the checks were completed in full and indicates equipment was taken as required for those convoys. Personnel interviewed described the process, what they check for and what equipment they take with them on each convoy.

Alistair Logistics vehicle operators do receive initial and periodic refresher training in emergency response procedures including implementation of the Emergency Response Plan. This is provided through periodic cyanide awareness training.

Alistair Logistics has developed procedures to inspect emergency response equipment and assure its availability when required. The checks are completed prior to departure for each convoy by the convoy leader and collated with delivery documentation. The CTMP details the inspections to be conducted and those personnel responsible for conducting the checks.

Alistair Logistics does not currently subcontract handling or transportation of cyanide.

2.3.3 Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

in full compliance with

Alistair Logistics is

in substantial compliance with

Transport Practice 3.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Alistair Logistics has developed procedures and current contact information for notifying the shipper, the receiver/consignee, regulatory agencies, outside response providers, medical facilities and potentially affected communities of an emergency. Alistair Logistics has developed procedures and holds current contact information for notifying the shipper, the receiver/consignee, regulatory agencies, outside response providers, medical facilities and potentially affected communities of an emergency. The first section of the

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CTMP details the names and contact information for key stakeholders and the route assessment details the contact information for identified responders.

Alistair Logistics has systems in place to ensure that internal and external emergency notification and reporting procedures are kept current. The CTMP is reviewed on an annual basis and following incidents, emergencies, mock exercises and audits. The plan is updated as needed.

2.3.4 Transport Practice 3.4

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

in full compliance with

Alistair Logistics is

in substantial compliance with

Transport Practice 3.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Alistair Logistics is in FULL COMPLIANCE with Transport Practice 3.4 requiring that they develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

Alistair Logistics has implemented procedures for remediation, such as recovery or neutralisation of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris. SERG 2 details decontamination of a sea container and SERG 5 details the process and precautions to follow when decontaminating a spill of solid sodium cyanide to soil. The process detailed would involve consultation with the regulator and mine as to the most suitable disposal options.

The procedure does prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water. SERG 4 states: Alistair Logistics subscribes to the recommendations of the International Cyanide Management Code in that no chemicals are to be added to a flowing water way in the event of a cyanide spill as these may only exacerbate the situation with their own toxicity characteristics.

2.3.5 Transport Practice 3.5

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

in full compliance with

Alistair Logistics is

in substantial compliance with

Transport Practice 3.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Alistair Logistics has provisions to periodically review and evaluate the CTMP's adequacy and these are being implemented. The CTMP is reviewed on an annual basis and following incidents, emergencies, mock exercises and audits. The CTMP is updated as needed. The CTMP was first developed in January 2014 and there have been two revisions of the document since inception.

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Provisions are in place of periodically conducting mock emergency drills. The CTMP provides for the conduct of desktop exercises annual and emergency response simulation drills to be undertaken annually and a full scale scenario every three years. Alistair Logistics has completed one simulated emergency response exercise and one desktop emergency response exercise to date.

Alistair Logistics has included provisions to evaluate the CTMP's performance after its implementation and revise it as needed as noted in 3.5.

3.0 LIMITATIONS

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

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Report Signature Page

GOLDER ASSOCIATES PTY LTD

A handwritten signature in black ink, appearing to read 'Mike Woods'.

Mike Woods
ICMC Lead Auditor and ICMC Transportation Expert

MCW/EWC/asu

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APPENDIX A

Limitations



LIMITATIONS

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