INTERNATIONAL CYANIDE MANAGEMENT CODE CYANIDE TRANSPORTER AUDIT

Anqing Shuguang Supply, Sales and Transportation Co. Ltd., Certification Audit
Summary Audit Report

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

Anqing Shuguang Supply, Sales and Transportation Co. Ltd.,
106 Shuguang Road,
Anqing, Anhui, 246003
PEOPLES REPUBLIC OF CHINA

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Limitations
1.0 INTRODUCTION

1.1 Operational Information

Name of Transportation Company: Anqing Shuguang Supply, Sales and Transportation Co. Ltd.

Name of Cyanide Manufacturer: Anhui Anqing Shuguang Chemical Co. Ltd.

Name of Responsible Manager: Mr Pan Kui, Vice-Manager, Shuguang

Address: 106 Shuguang Road, Anqing

State/Province: Anhui, 246003

Country: PEOPLES REPUBLIC OF CHINA

1.2 Description of Operation

Shuguang is a contracted forwarding agent for Anhui Anqing Shuguang Chemical Co., Ltd. (a manufacturer of cyanide) and responsible for road transportation of cyanide within China. The company has applied for ICMI transportation code authentication.

Approved by the Anhui Provincial Bureau of Transport and the Anhui Provincial Administration of Work Safety, Shuguang is engaged in the road transportation and handling of dangerous chemicals (“DC”). Shuguang is a designated enterprise for the road transportation of dangerous goods in Anhui Province.

Cyanide is packaged into timber boxes or steel drums by the cyanide manufacturer. The boxes and drums are loaded at the manufacturing site onto Shuguang trucks by the cyanide manufacturer. The trucks comprise enclosed trailers into which the boxes and drums area loaded. The trucks are sealed by Shuguang’s truck driver. The trucks then depart directly for the customer site. The driver and the receiver confirm the integrity of the seal and then remove the seal together. The receiver then unloads the truck. The truck then returns to Shuguang.

There are two drivers per truck. The drivers work in 4 hour shifts. The resting driver will sleep in a bed compartment in the truck while the second driver drives the truck. The trucks do not stop on the way to the delivery site. The truck drivers may stop the truck to rest during the return journey when the trucks are empty.

Shuguang has been transporting cyanide since 1995. Each of the 10 customers has been supplied in the last year and has been supplied by Shuguang for at least one year as of December 2012.

Currently Shuguang undertakes transport of cyanide via 10 road transportation routes, all of which are in China. The destinations are summarized in Table 1.

<table>
<thead>
<tr>
<th>Destination</th>
<th>Distance from Anqing (km)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Erenhot Warehouse for DC.¹</td>
<td>1,984</td>
</tr>
<tr>
<td>Hangzhou Railway Station (North)²</td>
<td>464</td>
</tr>
<tr>
<td>Hefei Railway Station³</td>
<td>170</td>
</tr>
<tr>
<td>Shanghai Deepwater Port Warehouse (or Gangcheng DC Warehouse).</td>
<td>601</td>
</tr>
<tr>
<td>Kunming Guandu District Warehouse No.262</td>
<td>2,408</td>
</tr>
<tr>
<td>Xingyi Bishan Road Distributor Warehouse</td>
<td>2,084</td>
</tr>
</tbody>
</table>

Table 1: Shuguang’s Cyanide Transport Destinations
### Destination Distance from Anqing (km)

<table>
<thead>
<tr>
<th>Destination</th>
<th>Distance from Anqing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shenyang Dongyao Factory</td>
<td>1,963</td>
</tr>
<tr>
<td>Jinan Licheng District Huaxing Warehouse</td>
<td>819</td>
</tr>
<tr>
<td>Jinjiang Luoshanhoulin Village Distributor Warehouse</td>
<td>879</td>
</tr>
<tr>
<td>Nantong Xianzhengda Factory</td>
<td>576</td>
</tr>
</tbody>
</table>

Notes:

1. The cyanide is transported from Erenhot Warehouse via Mongolia Railway transportation to Boroo Mine in Mongolia. The railway transportation is not managed by Shuguang.

2. The cyanide is transported by China Railway Transportation to Urumqi DC Warehouse, then to Alataw Pass and then via Kazakhstan Railway Transportation to Kumtor Mine. The railway transportation is not managed by Shuguang.

3. The cyanide is transported by China Railway Transportation to Urumqi DC Warehouse, then to Alataw Pass and then via Kazakhstan Railway Transportation to Kumtor Mine. The railway transportation is not managed by Shuguang.

The best routes determined by Shuguang for the 10 above-mentioned cyanide transportation routes are all established highways, which is in accordance with the approved transportation routes from the governmental traffic management department. In addition, each route has been prepared with an alternative in case of emergency.

The cyanide transportation undertaken by Shuguang is all by road. All of the trucks involved during transport are owned and managed by Shuguang. All of the truck drivers are employees of Shuguang.

### 1.2.1 Transit Storage

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. At no stage is cyanide removed from the trucks or containers prior to unloading at customer sites or transit warehouse or shipping port.
1.3 Auditor’s Findings and Attestation

Anqing Shuguang Supply, Sales and Transportation Co. Ltd. is:

☑ in full compliance with

☐ in substantial compliance with

☐ not in compliance with

the International Cyanide Management Code

Audit Company: Golder Associates
Audit Team Leader: Tom Carmichael, RABQSA (14544)
Email: tomcarmichael@golder.com.au

1.4 Name and Signature Auditor

<table>
<thead>
<tr>
<th>Name</th>
<th>Position</th>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tom Carmichael</td>
<td>Lead Auditor and Technical Specialist</td>
<td>[Signature]</td>
<td>20 March 2013</td>
</tr>
</tbody>
</table>

1.5 Dates of Audit

The Certification Audit was undertaken over three days (3 person-days) on 4, 5 and 6 December 2012.

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Verification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Transportation Operations and using standard and accepted practices for health, safety and environmental audits.
2.0 CONSIGNOR SUMMARY

2.1 Principle 1 – Transport

The Code requires the consignor to “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
☐ in substantial compliance with
☐ not in compliance with

Transport Practice 1.1

Summarise the basis for this Finding/Deficiencies Identified:

Shuguang is in FULL COMPLIANCE with Transport Practice 1.1 requiring cyanide transport routes to be selected to minimise the potential for accidents and releases.

Shuguang has developed and implemented a procedure to guide the selection of transport routes to minimise the potential for accidents and releases or the potential impacts of accidents and releases. Shuguang has implemented the procedure and conducted route surveys for the selected routes. For each route, Shuguang has also identified a suitable alternative route for use in case of unacceptable conditions along the primary route.

Hazards identified during the route survey are risk assessed using a numerical risk scoring method. Once risk assessed, prevention and/or protective measures are identified and implemented to make the resulting risks more acceptable.

Shuguang has developed a procedure requiring annual route surveys and obtains feedback on route conditions from drivers.

Shuguang has documented measures taken to address risks identified with the selected routes within the Cyanide Transport Route Assessment Reports.

Due to the location of the routes in well developed areas of China and the structure of China’s emergency response system Shuguang has not been required to undertake direct consultations with governmental agencies in the selection of routes and development of cyanide management measures. It should be noted that each cyanide transport activity is subject to approval by the government and the approval process involves consideration of the transport route and potential risks.

Security escorts are not required along the transport routes due to their location in well developed areas and the low security risks. Shuguang advised that during 17 years of cyanide transport operations it had not experienced any significant security issues.

Cyanide is delivered as required throughout the year, typically in single truck transports.

In the event of an incident, primary emergency response is coordinated by Shuguang with assistance as required provided by China’s government emergency response services (police, ambulance, traffic authorities, hospitals and EPA).

In the event of an incident, the duties of primary responders include immediate notification to government authorities and medical facilities (as necessary). The roles of China’s public responders (police, ambulance and fire brigades) are defined in legislation.

Shuguang does not use subcontractors within the scope of this audit.
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
☐ in substantial compliance with
☐ not in compliance with

Transport Practice 1.2

Summarise the basis for this Finding/Deficiencies Identified:
Shuguang is in FULL COMPLIANCE with Transport Practice 1.2 requiring that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.
Shuguang uses dedicated Shuguang drivers that have appropriate training and vehicle licences to transport cyanide in accordance with Chinese legislative requirements.
All 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. The training of cyanide handling and transport equipment operators is provided by Shuguang.
All drivers hold licences issued by the Chinese governments authorising them to drive trucks carrying hazardous chemicals such as cyanide.

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

☒ in full compliance with
☐ in substantial compliance with
☐ not in compliance with

Transport Practice 1.3

Summarise the basis for this Finding/Deficiencies Identified:
Shuguang is in FULL COMPLIANCE with Transport Practice 1.3 requiring that transport equipment is suitable for cyanide shipment.
Shuguang only uses equipment designed and maintained to operate within the cyanide loads it will be handling. Equipment consists of road vehicles (truck – semi-trailers) that were purchased to a design specification appropriate for the cyanide transport task. Vehicle power, axle loadings and other parameters are set by the manufacturer and the loads are well within the legal capacities of the public roads.
The storage compartment of the trucks has been constructed according to the capacity of the trucks.
Shuguang has implemented a monthly, quarterly and annual vehicle maintenance program as well as a maintenance request program for breakdowns. In addition to the workshop maintenance, the truck drivers conduct an inspection of all prime movers and trailers prior to departure, during stops along the journey and upon return to Anqing.
Shuguang undertakes emergency response and training of Shuguang drivers.
All trucks and trailers used by Shuguang for cyanide transport are subject to annual maintenance inspections and approval by government authorities.

Anqing Shuguang Supply, Sales and Transportation Co. Ltd.

Name of Transport Business

Signature of Lead Auditor

Date

20 March 2013
2.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

☑ in full compliance with

☐ in substantial compliance with

☐ not in compliance with

Transport Practice 1.4

Summarise the basis for this Finding/Deficiencies Identified:

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

Shuguang has procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producer’s packaging. These comprise checks prior to departure, on route and at the customer hand-over point, prior to unloading.

Shuguang transports cyanide for a Code certified cyanide producer, which has systems in place to ensure its containers are labelled in accordance with the International Maritime Dangerous Goods (IMDG) Code and as required by local regulations or international standards. As a control measure, the cyanide is trucked by drivers who have received training in cyanide emergency response and dangerous goods training.

Shuguang has implemented a safety program for cyanide transport that includes:

- Vehicle inspections;
- Preventative maintenance;
- Limitations on operator or drivers’ hours;
- Procedures to prevent loads from shifting;
- Procedures to modify or suspend transport if conditions such as severe weather or civil unrest are encountered; and
- Drug abuse prevention.

2.1.5 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

Transport Practice 1.5

Summarise the basis for this Finding/Deficiencies Identified:

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

Shuguang does not transport consignments of cyanide by sea or air within the scope of this audit. Consignments of cyanide transported by Shuguang are loaded onto the trucks by the manufacturer in Anqing, which is Code certified cyanide producer. As a Code certified cyanide producer, the manufacturer has systems in place to ensure its containers are labelled in accordance with the International Maritime Dangerous Goods (IMDG) Code and as required by local regulations or international standards.
2.1.6 Transport Practice 1.6
Track cyanide shipments to prevent losses during transport.

☑ in full compliance with
☐ in substantial compliance with
☐ not in compliance with

Transport Practice 1.6

Summarise the basis for this Finding/Deficiencies Identified:

Shuguang is in FULL COMPLIANCE with Transport Practice 1.6 requiring the operation track cyanide shipments to prevent losses during transport.

All vehicles have communications systems that include cell phones and a GPS tracking system for trucks. Communication equipment is tested as part of a pre-start check to ensure it functions properly. The GPS tracking system signal is used continuously and is transmitted from each truck throughout the trip. Shuguang has not identified any cell phone communication blackout areas along transport routes.

The GPS tracking system continuously transmits position and other data from each truck throughout the trip. Shuguang implements chain of custody procedures to prevent loss of cyanide during shipment. The driver conducts inspections of the containers at the departure point and at the conclusion of each break. Once delivered, a customer representative signs a form acknowledging that the consignment was received in good condition and unopened. Seal numbers on the trucks are recorded upon departure and arrival and checked to ensure that the seal has not been disturbed during transport.

Shipping papers and Material Safety Data Sheets accompany each cyanide convoy.
2.2 Principle 2 – Interim Storage

The Code requires that the consignor “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

☐ in substantial compliance with 

☐ not in compliance with

Transport Practice 2.1

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 Shuguang. Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. At no stage is cyanide removed from the trucks or containers prior to delivery to the customer.
2.3 Principle 3 – Emergency Response

The Code requires that the consignor “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
☐ in substantial compliance with
☐ not in compliance with

Transport Practice 3.1

Summarise the basis for this Finding/Deficiencies Identified:

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

Shuguang has developed detailed documents to cover emergency response for potential cyanide releases for cyanide transportation within China. The information is contained within an Emergency Response Plan and Emergency Response Programs.

The Emergency Response Plan and Emergency Response Programs are based on road transportation between Anqing and the 10 designated customer delivery locations.

The plans are appropriate for the selected transportation route and they consider relevant aspects of the transport infrastructure. The route evaluation process, route hazard/risk assessment process, and operational experience was used by Shuguang identify likely emergency scenarios:

- Breakdown on highways.
- Breakdown on general roads.
- Traffic accidents.
- Spills in parking lots.
- Spills in mountainous areas.
- Spills to rivers.
- Spills on bridges.
- Spills in tunnels.

The plans consider the physical and chemical form of cyanide and design of the transport vehicle. Storage facility emergency response plans were not developed, as cyanide is not stored at an interim storage facility during transport by Shuguang.

The Emergency Response Plan and Emergency Response Programs include descriptions of response actions, as appropriate for the anticipated emergency situation. External responders identified in the documents are aware of their role in an emergency.
**2.3.2 Transport Practice 3.2**

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

☑ in full compliance with

☐ in substantial compliance with

☐ not in compliance with

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

Shuguang is in FULL COMPLIANCE with Transport Practice 3.2 requiring it designates appropriate response personnel and commit necessary resources for emergency response.

Shuguang provides emergency response training of appropriate personnel. Shuguang provides a 9 day training course to all new drivers prior to the commencement of their duties.

Refresher training is also provided to drivers, comprising 2 hours delivered twice per month on a rolling basis.

Records of the completed training attendance registers and training assessments were viewed for 2012.

The Emergency Response Plan identifies the specific emergency response duties and responsibilities of personnel for the specific scenarios. Descriptions of the specific emergency response duties and responsibilities Shuguang drivers are detailed within the Emergency Response Plan. The cyanide training provides additional detail of the responsibilities for each of the specific roles.

Shuguang maintains a list of all of the emergency response equipment that should be available during the transport route. The equipment is check prior to departure of each convoy.

Shuguang does not use subcontractors within the scope of this Audit.

**2.3.3 Transport Practice 3.3**

Develop procedures for internal and external emergency notification and reporting.

☑ in full compliance with

☐ in substantial compliance with

☐ not in compliance with

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

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

The Emergency Response Plan contains procedures and current contact information for notifying the shipper, the receiver/consignee, outside response providers, and medical facilities of an emergency.

The Emergency Response Plan details a communication flow chart and contact numbers. A copy of the Emergency Response Plan is kept in each truck.

Shuguang has procedures in place to ensure the contact numbers are kept current.
2.3.4 Transport Practice 3.4

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

☑ in full compliance with

The operation is ☐ in substantial compliance with Transport Practice 3.4 ☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Shuguang is in FULL COMPLIANCE with Transport Practice 3.4 requiring that it develops procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

Shuguang has 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.

The Emergency Response Plan and Emergency Response Programs include details on recovery and treatment of spills. A copy of these documents is kept in each of the convoy trucks and in the escort vehicle.

The training program also contains requirements for remediation depending on the spill. All Shuguang drivers receive this training yearly.

Shuguang’s Emergency Response Plan prohibits the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water.

2.3.5 Transport Practice 3.5

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

☑ in full compliance with

The operation is ☐ in substantial compliance with Transport Practice 3.5 ☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

The Emergency Response Plan and Emergency Response Programs contain provisions for periodically reviewing and evaluating the Plans’ adequacy. The Plans were prepared in mid 2012 so have not yet required review.

The Emergency Response Plan contains provisions for conducting mock drills and they are being implemented.

Seventy six Shuguang employees attended a one hour Solid Cyanide Transportation Spill Accident Drill on 17 November 2012. Attendance records, a description of the drill plan and photographs were kept. The drill plan includes the details of emergency response processes. As part of the drill, the drill plan required the on-site Emergency Response Team to read the plan to all attendees.

The drill scenario comprised a spill on the roadway and involved the participation of the police and the ambulance authorities. Photographs showed police blocking off the roadway around a cyanide delivery truck and personnel in coveralls, gloves and gas masks shovelling up a spill of cyanide into plastic bags.
The Emergency Response Plan contains provisions for conducting a review after an incident. The Emergency Response Plan also requires the emergency documents to be updated after an accident.
ANQING SHUGUANG SUPPLY, SALES AND TRANSPORTATION CO. LTD., SUMMARY AUDIT REPORT

March 2013
Report No. 127643037 004 R Rev1

Report Signature Page

GOLDER ASSOCIATES PTY LTD

Tom Carmichael
ICMI Lead Auditor, Associate
TC/EWC/gf

A.B.N. 64 006 107 857

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j:envi/2012/127623070_shuguang_icmi_audit_anhui/correspondence out/127643070 001 r rev1 anhui anqing shuguang transportation audit - summary audit report - final for icmi.docx
APPENDIX A

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