

Correction Action Plan						
Name of operation: Beagle Shipping S.A.		Dates of Audit: February 26 -27, 2020		Audit Team Leader: Bruno A. Pizzorni		
Transport Practice	Protocol question	Brief description of the deficiency(s)	Detail description of the corrective action required	Evidence required	Completion date	Comments
<b>Transport Practice 3.1:</b> Prepare detailed emergency response plans for potential cyanide releases.	3.1.2 Is the plan appropriate for the selected transportation route or interim storage facility?	The plan is not appropriate for the transport operation. Contains elements that do not apply to the current operation, e.g. disposal of waste in mine, actions of first and second response, monitor HCN, among others according to annotations in the revised plan.	Develop and implement an emergency response plan to reflect actions according to the response capabilities and ongoing operations.	<ul style="list-style-type: none"> <li>- Emergency response plan developed and implemented for the transport operation</li> <li>- Records on training in the new plan to all personnel involved in the operation of cyanide transport.</li> <li>- Record of proof of understanding of the new plan (exams on the training)</li> </ul>	February 26, 2021	
	3.1.7 Does the plan include descriptions of response actions, as appropriate for the anticipated emergency situation?	Throughout the plan, different response actions to the same scenario are described, creating confusion. There is no coherence	Maintain the coherence throughout the plan describing the response actions, as appropriate for the anticipated emergency situation.	<ul style="list-style-type: none"> <li>- Emergency response plan that includes descriptions of response actions, as appropriate for the anticipated emergency situation</li> <li>- Records of an emergency response mock drill involving a cyanide spill and exposure to workers, where these response actions have been tested.</li> </ul>	February 26, 2021	
<b>Transport Practice 3.4:</b> Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.	3.4.1 Are there procedures for remediation, such as recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris?	Remediation actions are scattered in the plan. The plan describes sanitation actions that escape the capabilities of the transport company.	Beagle is required to describe objectively and in detail the remediation actions that they reasonably will address as the first response and what actions correspond to a second response and who will carry them out after a cyanide spill.	Emergency response plan or procedures describing in detail actions for remediation, such as recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris	February 26, 2021	