



August 2016

INTERNATIONAL CYANIDE MANAGEMENT CODE

Bolloré Transport & Logistics Burkina Faso, Re-Certification Audit, Summary Audit Report

Submitted to:

International Cyanide Management Institute (ICMI)
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REPORT



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Distribution:

- 1 Copy (+1 Electronic) – International Cyanide Management Institute
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- 1 Electronic Copy – Golder Associates Pty Ltd





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Important Information



1.0 INTRODUCTION

1.1 Operational Information

Name of Transportation Facility: Bolloré Transport & Logistics Burkina Faso
Name of Facility Owner: Bolloré Africa Logistics
Name of Facility Operator: Bolloré Transport & Logistics Burkina Faso
Name of Responsible Manager: Olivier Restoueix, Q-HSE Africa Manager, Bolloré Africa Logistics
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1.2 Bolloré Transport & Logistics Burkina Faso

The Bolloré Group was founded in 1822. From its beginnings in thin papers, the Group has diversified its product ranges and services. It is now involved in plastic films for capacitors and packaging, electric batteries, thin papers, transportation in Africa (freight forwarding and stevedoring, railways) and international logistics, fuel distribution and dedicated terminals and systems.

The Africa transportation arm of the Group is managed by Bolloré Africa Logistics which has been established for more than 50 years. The company is involved in port activity, terrestrial transport and logistics solutions. Bolloré Africa Logistics is one of the largest transport and logistics operator in Africa.

Bolloré Transport & Logistics Burkina Faso is a subsidiary of Bolloré Africa Logistics based in Ouagadougou.

Bolloré Transport & Logistics Burkina Faso conducts:

- Air and sea freight forwarding
- National and international transport
- Customs brokerages
- Container management
- Lift-handling
- Warehousing.

Bolloré Transport & Logistics

Name of Facility

Signature of Lead Auditor

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Date



1.3 Burkina Logistics and Mining Services

Burkina Logistics and Mining Services (BLMS) is a subsidiary of Bolloré Africa Logistics and was formed in July 2008 to service the developing mining industry within Burkina Faso. The company specialises in:

- Transport and logistics of dangerous goods
- Crane hire.

BLMS conducts the transport of hazardous goods for Bolloré Transport & Logistics Burkina Faso and is integrated with and operates out of Bolloré Transport & Logistics offices in Burkina Faso.

1.4 Sodium Cyanide Transportation

During the audit period, Bolloré Transport & Logistics Burkina Faso transported cyanide to the following mines.

- Syama Gold Mine, Mali
- Essakane Gold Mine, Burkina Faso
- Bissa Gold Mine, Burkina Faso
- Taparko Gold Mine, Burkina Faso
- Kalsaka Gold Mine, Burkina Faso
- Youga Gold Mine, Burkina Faso
- Pekoa Zinc Mine, Burkina Faso.

Transport included collection and transport of cyanide from the Port of Tema in Ghana and the inter mine transport of cyanide within Burkina Faso.

The journey from the Port of Tema to the Ghana/Burkina Faso border takes 2.5 days driving with stopping overnight at designated locations. The trucks leave the Tema at approximately 4.30 am to avoid traffic and driving is not permitted after 6.30 pm.

The journey from the Ghana/Burkina Faso border takes half a day of driving and the trucks are not permitted to leave the border before 10.00 am. Trucks may overnight at Bolloré Transport & Logistics Burkina Faso yard in Ougadougou depending on the mine deliver. Transport from Ouagadougou to the Mali border takes one day and then a further 2.5 days to the Syama Gold Mine. Transport within Burkina Faso to mines is usually completed within 1-2 days.

Deliveries are undertaken in convoy with two 20 foot containers per truck with front and rear escort vehicles.

1.5 Transit Storage

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

Storage in transit may occur in the event that receipt at the port is delayed. In this event containers will not be removed from the trailers and the vehicles will only be parked for a maximum of 24 hours.

Bolloré Transport & Logistics

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15 August 2016

Date



1.6 Auditors Findings and Attestation

Bolloré Transport & 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

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

1.7 Name and Signatures of Other Auditors:

Name	Position	Signature	Date
Mike Woods	Lead Auditor and Technical Specialist		15 August 2016

1.8 Dates of Audit

The ICMC Certification Audit was conducted over two days between 10–11 March 2016.

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

Bolloré Transport & Logistics 15 August 2016
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

Bolloré Transport &

in substantial compliance with

Transport Practice 1.1

Logistics Burkina Faso is not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Bolloré Transport & Logistics Burkina Faso (here after referred to as Bolloré) is in FULL COMPLIANCE with Transport Practice 1.1 requiring cyanide transport routes to be selected to minimise the potential for accidents and releases.

Bolloré has implemented a process for selecting transport routes that minimises the potential for accidents and releases or the potential impacts of accidents and releases. The selected routes are detailed in route assessments together with identified controls. The controls are summarised in a specific route transport management plan.

Bolloré implements a procedure to evaluate the risks of selected cyanide transport routes and take the measures necessary to manage these risks. The risks are identified and evaluated through the route assessment process that details the hazards identified and their location along the route. The risk presented is assessed and controls documented.

Bolloré implements a process or procedure to periodically re-evaluate routes used for cyanide deliveries and has a process for getting feedback on route condition from the transporters' operators.

Updates on the routes are undertaken annually and follow the process detailed in the transport management procedure. In addition to the annual survey reports, a completed mission report is provided by the escort leader that includes feedback on the transport route conditions.

Bolloré documents the measures taken to address risks identified with the selected routes. These are detailed in route specific transport management plans with overarching controls provided in the TMP.

Bolloré has sought input from communities, other stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures. Bolloré has consulted with Ministre of Environment, Transportation, Health and Worker and requested feedback and assistance in selecting their routes. Bolloré provided annual communication to Ministre informing them of the routes and requesting assistance.

Bolloré use convoys and escorts as part of their security measures. The convoys within Burkina Faso include police escort. The convoy procedures are detailed within the route specific transport management plan and recorded in the Rapport de Mission.

Bolloré has advised external responders, medical facilities and communities of their roles and/or mutual aid during an emergency response. Bolloré formally advises identified stakeholders on an annual basis. For each convoy in Burkina Faso there is a letter confirming the Police escort.

Bolloré does not subcontract cyanide handling or transport operations within the scope of this audit.

Bolloré Transport & Logistics

Name of Facility



Signature of Lead Auditor

15 August 2016

Date



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

Bolloré Transport & in substantial compliance with **Transport Practice 1.2**

Logistics Burkina Faso is not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Bolloré 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.

Bolloré uses only trained, qualified and licensed operators to operate its transport vehicles. The driver must hold a current drivers licence (class E) and there is an evaluation process where the driver is assessed prior to being permitted to transport cyanide.

Bolloré 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.

Bolloré does not subcontract cyanide transport or handling.

2.1.3 Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

in full compliance with

Bolloré Transport & in substantial compliance with **Transport Practice 1.3**

Logistics Burkina Faso is not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Bolloré only uses equipment designed and maintained to operate within the loads it will be handling. Bolloré transport two containers of cyanide on a 4 axle trailer which is linked to legal requirements in Burkina. Bolloré have procedures for maintenance of equipment that details the initiation of the maintenance, diagnostics, repairs, testing and close out.

There are procedures for verifying the adequacy of equipment. This is performed by the escort team who undertake check of vehicles prior to transport. Drivers and escorts complete the inspection which verifies the mechanical condition prior to transport. If error is identified, then the process for repairs is followed.

There are procedures in place to prevent overloading of the transport trucks. Procedures detail the transport of a maximum of two containers on the 4 axle trailer with the prime mover. Axle load Control certificates from the Ghana Highway authority were reviewed for deliveries and were within tolerance levels for the roads.

Bolloré does not subcontract cyanide transport or handling.

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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

Bolloré Transport & Logistics Burkina Faso is in substantial compliance with **Transport Practice 1.4**

Logistics Burkina Faso is not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

There are procedures to ensure that cyanide is transported in a manner that maintains the integrity of the producers packaging. Part of the procedure is to check the integrity of the seals on the shipping container at designated intervals along the transport route. In addition, there is a police mission form that details escort from the border to the mine site.

Placards and signage used to identify the shipment as cyanide meet local and international standards. Diamonds placed at the front and rear of the vehicle identify the load as cyanide and the containers also have labelling that identifies the contents of the container.

Bolloré implements a safety programme for cyanide transport that includes:

- Vehicle inspections
- Preventative maintenance
- Limitations on operator or drivers' hours
- Procedures to prevent loads from shifting
- Procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered
- Drug abuse prevention.
- Retention of records.

Bolloré does not subcontract cyanide transport or handling.

2.1.5 Transport Practice 1.5

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


in full compliance with

Bolloré Transport & Logistics Burkina Faso is in substantial compliance with **Transport Practice 1.5**

Logistics Burkina Faso is not in compliance with

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 Bolloré.

<u>Bolloré Transport & Logistics</u>		<u>15 August 2016</u>
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Bolloré does not transport consignments of cyanide by sea within the scope of this audit.

Bolloré does not transport consignments of cyanide by air within the scope of this audit.

2.1.6 Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

in full compliance with

Bolloré Transport & in substantial compliance with

Transport Practice 1.6

Logistics Burkina Faso is not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Bolloré transport vehicles have equipment to communicate with the transport company, the mining operation, the cyanide producer or distributor and/or emergency responders throughout the convoy, including radios, mobile phones for each driver and escort and one satellite phone.

The convoy leader calls into the office on departure and arrival each day and the vehicles are provided with GPS tracking that provides automated reports on the progress of the convoy.

Communication equipment is periodically checked for functionality. Checks are part of a pre-departure process that the escort commander verifies with the driver of the vehicle.

Bolloré has completed and reviewed route assessments for shipments and no blackout areas were identified in Burkina Faso. However a satellite phone is provided to the escort leader should there be an issue with the mobile network. Shipments travel in convoy under police escort.

Bolloré has systems in place to track the progress of cyanide shipments. Vehicles are fitted with GPS tracking and the real time location of the convoy can be checked via the My Tracker website. In addition, the tracking system is configured to send automated updates (via GPS and by scheduled call-ins by the convoy leader) when the convoy enters designated areas.


Container numbers and seals are recorded upon collection and the report is checked periodically on the journey to the mine site. This is recorded on the *Identification Convoi Unites De transport et Chargement* form and the periodic checks on the *Feuille de Route Form*. The *Bordereau de Livraison* is signed by the client upon delivery to the site, the escort leader signs off on the *Identification*.

In addition, there is a police mission form that details escort from the border to the mine site.

Shipping records indicating the amount of cyanide in transit are available and MSDS are available during transport. The amount of cyanide is indicated on the bill of loading and also on the pre-departure checks where the number of the container, seals are recorded against the vehicle they are loaded onto. Bolloré transport SAMSUNG and AGR Products. MSDS is provided with a procedures folder including the MSDS for cyanide.

Bolloré does not subcontract cyanide transport or handling.

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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

Bolloré Transport & in substantial compliance with

Transport Practice 2.1

Logistics Burkina Faso is 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 Bolloré.

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

Storage in transit may occur at the event that transport is delayed. In this event, containers will not be removed from the trailers and the vehicles will only be parked for a maximum of 24 hours.

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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

Bolloré Transport & in substantial compliance with

Transport Practice 3.1

Logistics Burkina Faso is not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Bolloré has developed an ERP. The ERP outlines the response scenarios and action to be taken in the event of an emergency.

The plan is appropriate for the selected transportation route; Bolloré does not have an interim storage facility. The ERP is based on scenarios that have been derived from the transport management plan and route survey process. The ERP contains four scenarios that have been development for foreseeable cyanide incidents along the transport routes.

The plan considers both the physical and chemical form of cyanide. Bolloré transport solid sodium cyanide in IBCs within sea containers. The response scenarios provided in the ERP take into account the properties of the product in the response actions developed.

The plan considers the method of transport. The ERP scenarios are based on the route survey which considers the transport vehicles.

The plan considers the aspects of the transport infrastructure. Route surveys have been completed from the Port of Tema to customer mine sites and the ERP has been based on the risks identified and assessed through the route survey process.

The plan considers the design of the transport vehicle. Bolloré utilise 6x4 prime movers to pull 4 axle trailers that carry two 20' containers that are secured with twist locks. When transiting through Ghana, cargo straps are added. The scenarios contained within the ERP are based on this transport configuration.

The plan includes descriptions of response actions, as appropriate for the anticipated emergency situation. There ERP details the response actions for the escort leader, escorts and drivers in the event of an incident. In addition to the actions of Bolloré personnel, the Police escorting the convoy assist with controlling the public and traffic.

The plan identifies the roles of outside responders and medical facilities in the response process.

The plan describes the actions for the Police who provide escort to the convoy in Burkina Faso and the interface with outside responders through the escort leader. The operation communicates with Ministres on an annual basis including medical support and emergency response should it be necessary.

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2.3.2 Transport Practice 3.2

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

in full compliance with

Bolloré Transport & in substantial compliance with **Transport Practice 3.2**

Logistics Burkina Faso is not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Bolloré provides emergency response training of appropriate personnel. The operation provides training on the response process through the *cyanide training package* that details the response actions and responsibilities in the event of a cyanide incident. This training package is completed by drivers and the escort personnel.

There are descriptions of the specific emergency response duties and responsibilities of personnel, detailed in the ERP.

There is a list of all emergency response equipment that should be available during transport or along the transportation route. This is provided in the ERP and also the pre-departure checks that are performed for each convoy.

Bolloré has the necessary emergency response and health and safety equipment, including personal protective equipment during transport. A review of pre-departure records confirmed that Bolloré has systems in place to check that equipment is available during transport.

Bolloré provides vehicle operators with initial and periodic refresher training in emergency response procedures including implementation of the ERP. This is provided on an annual basis through the *cyanide training package* and mock drill process.

There are procedures to inspect emergency response equipment and assure its availability when required. A review of pre-departure records confirmed that Bolloré has systems in place to check that equipment is available during transport.

Bolloré does not subcontract cyanide handling or transport.

2.3.3 Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

in full compliance with

Bolloré Transport & in substantial compliance with **Transport Practice 3.3**

Logistics Burkina Faso is not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Bolloré is in FULL COMPLIANCE with Transport Practice 3.3 requiring that it develops procedures for internal and external emergency notification and reporting.

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There are procedures and current contact information for notifying stakeholders including the supplier, mine and government agencies. The ERP details the escalation process and contact information is reviewed annually and updated as needed.

There are systems in place to ensure that internal and external emergency notification and reporting procedures are kept current, i.e. reviewed annually.

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

Bolloré Transport &

in substantial compliance with

Transport Practice 3.4

Logistics Burkina Faso is

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Bolloré 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.

Bolloré has developed procedures for the recovery and neutralisation of cyanide including solids and solutions. Bolloré have developed response procedures for foreseeable incident scenarios and Scenario 4 of the ERP provides the process for neutralisation of spills using sodium hypochlorite.

The procedure prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water. The procedure states:

Warning: The neutralizing solution must only be used on the ground: it is forbidden to use the solution neutralizing to treat cyanide spilled in an expanse of water, a water course, a river. CYANIDE FALLS IN THE WATER MAY NOT BE NEUTRALIZED.

2.3.5 Transport Practice 3.5

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

in full compliance with

Bolloré Transport

in substantial compliance with

Transport Practice 3.5

Logistics Burkina Faso is

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Bolloré undertakes annual mock drills to evaluate their response and the adequacy of their ERP. The drills involve the drivers and escorts involved in the transportation of cyanide and are observed by the QHSE team. Drills are recorded and assessed for compliance with the plan and improvements. Improvements are logged in the Plan d’Action Global Transport Cyanure and tracked through completion and verification.

There are provisions for conducting mock drills. Debriefs are undertaken following the annual mock drills that identify a requirement for improvements.

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There are procedures to evaluate the plan's performance after its implementation and revise as needed. Bolloré has not had to activate the plan during the audit period and the reviews have been based on the mock drills undertaken. As part of Bolloré quality assurance system there is a register of actions that is used to track progress, completion and verification.

3.0 IMPORTANT INFORMATION

Your attention is drawn to the document titled "Important Information Relating to this Report", which is included in Appendix A of this report. The statements presented in that document are intended to inform a reader of the report about its proper use. There are important limitations as to who can use the report and how it can be used. It is important that a reader of the report understands and has realistic expectations about those matters. The Important Information document does not alter the obligations Golder Associates has under the contract between it and its client.

Bolloré Transport & Logistics
Name of Facility



Signature of Lead Auditor

15 August 2016
Date



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/hn

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APPENDIX A

Important Information



IMPORTANT INFORMATION RELATING TO THIS REPORT

The document (“Report”) to which this page is attached and which this page forms a part of, has been issued by Golder Associates Pty Ltd (“Golder”) subject to the important limitations and other qualifications set out below.

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The scope of Golder’s Services and the period of time they relate to are determined by the Contract and are subject to restrictions and limitations set out in the Contract. If a service or other work is not expressly referred to in this Report, do not assume that it has been provided or performed. If a matter is not addressed in this Report, do not assume that any determination has been made by Golder in regards to it.

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Having regard to the matters referred to in the previous paragraphs on this page in particular, carrying out the Services has allowed Golder to form no more than an opinion as to the actual conditions at any relevant location. That opinion is necessarily constrained by the extent of the information collected by Golder or otherwise made available to Golder. Further, the passage of time may affect the accuracy, applicability or usefulness of the opinions, assessments or other information in this Report. This Report is based upon the information and other circumstances that existed and were known to Golder when the Services were performed and this Report was prepared. Golder has not considered the effect of any possible future developments including physical changes to any relevant location or changes to any laws or regulations relevant to such location.

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Any uncertainty as to the extent to which this Report can be used or relied upon in any respect should be referred to Golder for clarification.

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