

# INTERNATIONAL CYANIDE MANAGEMENT CODE

## Summary Audit Report.

### **Bolloré Transport & Logistics Burkina Faso, Re-Certification Audit,**

**Submitted to: -**

International Cyanide Management Institute (ICMI)  
1400 I Street, NW  
Suite 550  
Washington, DC 20005  
UNITED STATES OF AMERICA

**Report of: -**

**Bolloré Transport & Logistics**  
32,Rue de l'UNICEF- 01 BP 379  
Ouagadougou- Burkina Faso

Abdoulaye OUATTARA  
Q-HSE Manager & Délégué Ethique  
T (+226) 25 49 30 39 - M (+226) 70 20 37 17 (nouveau numéro)  
[abdoulaye.ouattara@bollore.com](mailto:abdoulaye.ouattara@bollore.com) - [bollore-transport-logistics.com](http://bollore-transport-logistics.com)

Bolloré Transport & Logistics  
Name of Facility



Signature of Lead Auditor

15<sup>th</sup> August 2019  
Date

## 1.0 INTRODUCTION

### 1.1 Operational Information.

<b>Name of Transportation Facility:</b>	Bolloré Transport & Logistics, Burkina Faso.
<b>Name of Facility Owner:</b>	Bolloré Africa Logistics
<b>Name of Facility Operator:</b>	Bolloré Transport & Logistics Burkina Faso
<b>Name of Responsible Manager:</b>	Abdoulaye Ouattara Q-HSE Manager & Délégué Ethique Bolloré Transport & Logistics.
<b>Address:</b>	32,Rue de l'UNICEF- 01 BP 379 Ouagadougou, Burkina Faso
<b>State/Province:</b>	NA
<b>Country:</b>	Burkina Faso.
<b>Telephone:</b>	T (+226) 25 49 30 39 - M (+226) 70 20 37 17 (nouveau numéro)
<b>Fax:</b>	none
<b>Email:</b>	abdoulaye.ouattara@bollore.com

### 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

15<sup>th</sup> August 2019  
Date

### 1.3 Burkina Logistics and Mining Services.

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

- Transport and logistics of classified 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
- Iam Gold Mine, Burkina Faso
- Essakane Gold Mine, Burkina Faso
- Malou Bissa Gold Mine, Burkina Faso
- Norgold Somita Gold Mine, Burkina Faso
- Kalsaka Gold Mine, Burkina Faso

Transport included collection and transport of Sodium 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 05.00 to avoid traffic and driving is not permitted after 18.30.

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. Convoy of 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 which is the furthest Consignee. Transport within Burkina Faso to mines, is usually completed within 1-2 days.

Deliveries are undertaken in convoy consisting of maximum seven vehicles with the convoy leader leading the convoy and one light delivery van trailing the convoy. Two 6 meter freight containers loaded per trailer and for security reasons stacked back to front.

### 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 period of 12 hours.

Bolloré Transport & Logistics  
Name of Facility

  
Signature of Lead Auditor

15<sup>th</sup> August 2019  
Date

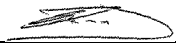
**1.6 Auditors Findings and Attestation.**

- Bolloré Transport & Logistics is**
- in full compliance with***
  - in substantial compliance with Cyanide Management Code
  - not in compliance with

**Audit Company:** Tommie Müller South Africa.  
**Audit Team Leader:** Tommie Müller  
**E-mail:** [tommieb.muller@gmail.com](mailto:tommieb.muller@gmail.com)

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
Thomas B Müller	Lead Auditor		15 <sup>th</sup> August 2019

**1.8 Dates of Audit.**

The ICMC Certification Audit was conducted over three days between 8 – 10 July 2019.

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  
 Name of Facility

  
 Signature of Lead Auditor

15<sup>th</sup> August 2019  
 Date

**Principle 1 – TRANSPORT.** Transport Cyanide in a manner that minimises the potential for accidents and releases.

Transport Practice 1.1 *Select cyanide transport routes to minimise the potential for accidents and releases.*

Bolloré Transport & Logistics Burkina Faso is  **in full compliance with**  
 in substantial compliance with Transport Practice 1.1  
 not in compliance with

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

Bolloré Transport & Logistics Burkina Faso being the transporter of cyanide, hereafter is referred to as Bolloré.

Transport Practice 1.1 requires that the transporter implement a process or have a procedure for the selecting of transport routes (primary and secondary) to be selected to minimise the potential for accidents and releases of cyanide.

The facility has been granted by the Ghana Environmental Protection Agency a permit to transport cyanide through Ghana to Burkina Faso.

Bolloré has implemented a route selection process for selecting transport routes that could minimise the potential for accidents and releases or the potential impacts of accidents and releases. The selected routes are detailed in route risk assessments.

Bolloré implemented a procedure to identify the risks along the selected cyanide transport routes and documented the control measures necessary to manage, minimise or eradicate 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. The controls are summarised in a specific route Transport Management Plan.


The Route Risk Assessment process took the following into account when conducting the assessment. The towns that the convoy need to pass through, villages, rivers, water sources, road pitch, road surface, bridges, hills, sharp curves on the road etc. as well as the security issues between Tema and the mines in Burkina Faso

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 Plan. In addition to the annual survey reports, a completed report is provided by the Convoy Leader that includes feedback on the transport route conditions.

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 Minister of Transport in Ouagadougou, Minister of Environmental Affairs in Burkina Faso, Ministre Des Sante la Sante, Ghana Environmental Protection Agency who issued a transport permit for the transportation of hazardous chemicals in Ghana. The Ghana Environmental Protection Agency represents the community within the borders of Ghana. No special transport permit required in Burkina Faso.

*The roles and responsibilities of external responders, medical facilities and communities during an emergency situation, were spelt out in a letter to each of the entities.*

Bolloré Transport & Logistics  
Name of Facility

  
Signature of Lead Auditor

15<sup>th</sup> August 2019  
Date

*Acknowledgement of this communiqué received from responders.*

*1. Ministry of Transport Ministre Des Transports Terrestres Et Maritimes(DGTTM)], Ouagadougou.*

*Acknowledgement letter dated 4/3/2019 and signed by the Director General.*

*2. Ministre Des Sante la Sante - Letter dated 14/03/19 signed by the Secretariate General*

*3. Ministry of Environment (Minstre Des Environment) letter dated 14/03/19 signed by the Director.*

*License to handle Hazardous Chemicals, Transport No. EPA/CCMC/GAR/LHCT-53/18 issued 3/12/2018 that expires 2/12/2019. Permit issued by Ghana Environmental Protection Agency.*

Bolloré use convoys and escorts as part of their security measures. Two armed policemen accompany the convoy through Ghana to the Burkina Faso border. From the Burkina Faso side of the border, two armed guards accompany the convoy to the mine sites. Transport Management Plan stipulates that the Minister of Defence of Burkina Faso be informed about the intended shipment of cyanide.

The Company has implemented a procedure requiring the route surveys be revised at least on an annual basis and has a process of obtaining feedback during debriefing session on route conditions after each convoy. This forms part of the Convoy Leader's responsibilities.

Procedure "Route Risk Assessments" compiled and implemented to regularly evaluate and re-evaluate the risks on both the primary and secondary routes that the cyanide consignment will travel on. Procedure requires that the process for selecting transport routes and conducting of RRAs is re-evaluated on at least annual bases.

Convoy leaders, Bolloré drivers and drivers of the sub-contractor are informed about the risks on the routes as well as the precautionary measures to take to counter act the risks.

Procedure requires the obtaining of feedback during debriefing session on route conditions after each shipment from the Convoy Leader. This forms part of the Convoy Leader's responsibilities.

Bolloré has contracted part of the transportation of cyanide to a transport Company called Societe De Transport Et De Commerce Du Faso (SOTRACOF). The signed contract between Bolloré and SOTRACOF stipulate the roles and responsibilities of both the main contractor and sub-contractor. Bolloré manages the escort and the movement of the subcontractors trucks during deliveries.

All the elements of 1.101 to 1.107 are done and controlled by Bolloré Burkina Faso.

Bolloré Transport & Logistics  
Name of Facility



Signature of Lead Auditor

15<sup>th</sup> August 2019  
Date

**Transport Practice 1.2** *Select cyanide transport routes to minimise the potential for accidents and releases.*

Bolloré Transport & Logistics Burkina Faso is  **in full compliance with**  
 in substantial compliance with Transport Practice 1.2  
 not in compliance with

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

Bolloré uses only trained, qualified and licensed operators to operate its transport vehicles. The driver must hold a current drivers licence (class E) as well as a valid International motor vehicle license. Bolloré follow a directive in the form of Recruitment procedure (Recrutement Du Personnel) for employment of employees. Applicants are subjected to 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. The training covers Cyanide Awareness, Defensive Driving Training, First Aid, Use of Personal Protective Equipment, Fire Fighting (theoretical and practical), and HAZMAT training. The training is presented annually except the First Aid (every two years). Training presented to own and sub-contractor drivers are captured on a training matrix.

Validity of driving license are checked during the pre-departure inspections.

Bolloré ensures that the subcontract conforms to the requirements of transport practise 1.2.

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

Bolloré Transport & Logistics Burkina Faso is  **in full compliance with**  
 in substantial compliance with Transport Practice 1.3  
 not in compliance with

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

Bolloré only uses equipment designed and maintained to operate within the loads it will be handling.

The configuration of the trucks used for carriage of cyanide is 6x4 axle truck tractors. Bolloré Burkina Faso's own truck tractors are Renault Kerax with HP of 500 and HP 380 for carriage with capacity of 60mt. Four axle trailers are in use and can carry 2x6 meter (20ft) containers loaded with 20 crates of sodium cyanide with weight total of 46 ton which is within the legal requirements in Burkina Faso.

The subcontractor uses Sinotruck 6x4 truck tractors with a 420 HP engine capacity and three axle trailers that are designed to carry up to 60 ton.

Bolloré Transport & Logistics  
Name of Facility

  
Signature of Lead Auditor

15<sup>th</sup> August 2019  
Date

The equipment used are designed and maintained in accordance with the manufacturer's specifications and they carry load in accordance with the legal requirements of Burkina Faso and Ghana. Bolloré have procedures for maintenance of equipment that details the initiation of the maintenance, diagnostics, repairs, testing and close out. Service records are captured electronically. No overdue services noted.

Truck tractors and trailers are annually inspected by an Approved Inspection Authority and certified as inspected and certified as suitable to carry the mass of goods.

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.

Each trailer is weighed in the loading port of Tema prior to the convoy departing. There are weighing bridges along the transportation route managed by the Ghana Government. The trailers are weighed when consignment reaches such locations.

The requirements of transport practise 1.3 are applicable to the sub-contractor SOTRACOF and controlled by Bolloré.

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

Bolloré Transport & Logistics Burkina Faso is  in full compliance with  in substantial compliance  not in compliance with with Transport Practice 1.4

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

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.

A checklist for transport of containerised cargo in use and this document specifies checks on the container and this includes seals, correct labelling and general container condition

Convoy Leader to perform the following:

- ❖ Checks the state of the containers once loaded onto the trailer at the port.
- ❖ Checks that all required cyanide placards are on the container (UN no., class 6 and marine pollutant labels).
- ❖ Ensures that container seals are intact on the containers.

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 identifies the load as cyanide and the containers also have labelling that identifies the contents of the container.

A checklist (Checklist Verification Conteneur Lors De La Prise En Charge Au port De Chargement) -Doc No.BLX-BFA-BLMS-F-0006Rev 01 completed.

The Ghana Customs attach a tracking device on each container to track the containers until the convoy reaches the border between Ghana and Burkina Faso.

Bolloré Transport & Logistics  
Name of Facility

  
Signature of Lead Auditor

15<sup>th</sup> August 2019  
Date



The Ghana Customs attach a tracking device on each container to track the containers until the convoy reaches the border between Ghana and Burkina Faso.

The condition of the container is also checked by the port authority and a container interchange issued, to cover each container.

Bolloré implements a safety programme for cyanide transport that includes:

- ❖ Vehicle Inspections (pre-trip checks performed)
- ❖ Preventative maintenance
- ❖ Maintenance servicing of truck tractor and trailers at set intervals.
- ❖ QHSE Policy.
- ❖ Fatigue management policy. Limitations on operator re number of driving 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. Drug and Alcohol policy.
- ❖ number of driving hours, speed limits and other driving rules
- ❖ Rules for Driving

Bolloré retains documentation on return from delivery. Documents have retained for a minimum period of 4 years as per their policy.

Sub contractor conforms to the requirements of transport practise 1.401 to 1.403.7 and controlled by Bolloré..

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

Bolloré Transport & Logistics Burkina Faso is  **in full compliance with**  
 in substantial compliance with Transport Practice 1.5  
 not in compliance with

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

Bolloré does not transport consignments of cyanide by sea or air.

Bolloré Transport & Logistics  
Name of Facility

  
Signature of Lead Auditor

15<sup>th</sup> August 2019  
Date

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

Bolloré Transport & Logistics Burkina Faso is  **in full compliance with**  
 in substantial compliance with Transport Practice 1.6  
 not in compliance with

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

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

Bolloré has completed and reviewed route assessments for shipments and no blackout areas were identified in Burkina Faso. However a satellite phone (Inmarsat type) available to be used by the Convoy Leader should there is an issue with the mobile network. Shipments travel in convoy under police escort.

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.

Emergency telephone numbers of all the emergency responders on route are available with each of the Convoy Leader vehicles.

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.

Bolloré has systems in place to track the progress of cyanide shipments. Bolloré uses a tracking system GEO Detect System connected to the Mix Telematix GPS. Transporter's vehicles and that of the sub-contractor are fitted with GPS tracking devices. The real time location of the convoy can be checked. Bolloré has direct access to the tracking system of SOTRACOF.

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*.

Shipping records indicate the amount of cyanide in transit is available. Product MSDS is available during transport. The amount of cyanide is indicated on the bill of loading and also on the pre-departure checks. The number of the freight containers and the seal numbers are recorded against the vehicle they are loaded onto. Bolloré transport SAMSUNG products.

Bolloré has entered into a contract with their sub-contractor in which a clause stipulates that the sub-contractor to ensure that elements 1.601 to 1.606 are adhered to. Sub-contractor is controlled by Bolloré.

Bolloré Transport & Logistics  
Name of Facility

  
Signature of Lead Auditor

15<sup>th</sup> August 2019  
Date

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

Bolloré Transport & Logistics Burkina Faso is  in full compliance with  in substantial compliance  not in compliance with with Transport Practice 2.1

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

Transport Practice 2 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 off-loaded from the trailers and the vehicles will only be parked for a maximum of 12 hours.

**Principle 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.

Bolloré Transport & Logistics Burkina Faso is  in full compliance with  in substantial compliance  not in compliance with with Transport Practice 3.1

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

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 road 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 sodium cyanide (briquette form) in IBCs within sea freight 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 addresses four scenarios and are based on the route risk assessments which consider the road transport vehicles.

The plan considers the aspects of the transport infrastructure. The ER Plan is written with the transportation of cyanide from the Port of TEMA to the Consignee's premises by road. Route surveys have been completed from the Port of Tema to customer mine sites.

The ER Plan has been based on the risks identified noted during the conducting of the route risk assessments and found to be applicable and addresses the road infra structures along the routes.

The plan considers the design of the transport vehicles. Bolloré utilise 6x4 truck tractors (prime movers) to pull 4 axle skeletal trailers onto which two 6 meter (20 foot) sea freight containers each are each secured with four twist locks.

Bolloré Transport & Logistics  
Name of Facility

  
Signature of Lead Auditor

15<sup>th</sup> August 2019  
Date

Response of all the emergency responders on route been spelt out and confirmation thereof received. ER Plan found to be appropriate for the anticipated emergencies. There ERP details the response actions for the convoy leader and the vehicle 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 the outside emergency responders and medical facilities in the response process.

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

Bolloré Transport & Logistics Burkina Faso is  **in full compliance with**  
 in substantial compliance with Transport Practice 3.2  
 not in compliance with

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

Bolloré provides emergency response training of appropriate personnel.

Bolloré presented emergency response training e.g. cyanide awareness, the use of applicable protective equipment, calling for assistance, handling a product spill, cyanide first aid training to Convoy Leaders and their drivers as well as those of the sub contractor. Proof of relevant training (attendance registers) for each module available and noted.


The roles and responsibilities of the emergency responders are spelt out in the Emergency Response Plan. The transporter also provided training details to the external responders with regards to their actions and responsibilities in the event of a cyanide incident. Annually re-training for all responders is presented during September and October of each year. .

Convoy Leaders, transport vehicle operators (own and those of the sub-contractor) and Bolloré transport management personnel with assigned emergency response roles received both initial and annual refresher training regarding their responsibilities in the event of a cyanide release or exposure, including their role as designated in the Emergency Response Plan. At the office along with all the other emergency equipment that is taken with whilst on route, is a set of cyanide antidote. (Tripac-Cyano (Amyl Nitrite) antidote ("Cyanokit") This was found kept in a polystyrene packaging cooler box inside a fridge. Antidote found still to be within the expiry period. On route, antidote is kept in a cool box covered with ice. Cyanide related training presented is followed by annual emergency drills.

There are procedures to inspect emergency response equipment including the HCN gas monitors, to ensure its availability when required. Calibration certificates are available with regards to the gas monitors. A review of pre-departure records confirmed that Bolloré have systems in place to check that equipment is available and operative during transport. Inspection checklists support the aforementioned statement.

The sub-contractor drivers attended training of cyanide awareness, the contents of the transporter's Emergency Management Plan, the use of required PPE for cyanide and all other relevant procedures and instructions. Proof of relevant training noted in attendance registers as well as competency tests. Sub-contractor's drivers are controlled by Bolloré.

Bolloré Transport & Logistics  
Name of Facility

  
Signature of Lead Auditor

15<sup>th</sup> August 2019  
Date

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

Bolloré Transport & Logistics Burkina Faso is  **in full compliance with**  
 in substantial compliance with Transport Practice 3.3  
 not in compliance with

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

There are procedures in place and the current contact information for notifying stakeholders including the supplier, mine and government agencies available and found to be up to date. The ERP details the escalation process and contact information is reviewed annually and updated as needed.

Procedures are in place for the notification of appropriate transporter's and external emergency parties in the event of a cyanide release or exposure during transport. The emergency telephone list and emergency contact procedures are available to all entities that may need to use them.

Procedures and telephone list are included in the Emergency Response Plan. Both these documentation is carried in the Convoy Leader's vehicle and thus available when needed. As a minimum, the entities who are required to be notified are the ones identified in the Emergency Response Plan as having designated roles in the responsibilities to fulfil during an emergency situation.

There are procedures and systems in place to ensure that emergency contact information for internal and external emergency notification and reporting, are kept current. Provision is made in the Emergency Response Plan for annual or more frequent review of the entire plan, the periodic updating of contact information specifically and a procedure to test each contact numbers on a regular basis.

The procedures and telephone numbers were viewed and some numbers tested to determined that it is still active.

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

Bolloré Transport & Logistics Burkina Faso is  **in full compliance with**  
 in substantial compliance with Transport Practice 3.4  
 not in compliance with

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

Bolloré has developed procedures for the recovery and neutralisation of cyanide in solid form.

Procedures for the recovery and neutralisation of cyanide in solid form have been developed. Convoy Leader is responsible for the recovery of solids and the rehabilitation of the affected area. Contaminated soil/product taken to consignee for disposal. Document No. ER Plan No. BLX-BFA-BLMS-MAN-0002 rev 14, clause 3.3.3 Scenario No 4, sub-clause 9 provides the process for neutralisation of spills.

The ER Plan stipulates that cyanide that have landed in water, rivers or water sources, the use of sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat or neutralise the cyanide may under NO circumstances be used.

Bolloré Transport & Logistics  
Name of Facility

  
Signature of Lead Auditor

15<sup>th</sup> August 2019  
Date

However Ferrous Sulfate in small quantities may be used to locate traces of solid cyanide remains on dry ground after clean-up have been done.

Emergency responders are aware of the rulings as above.

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

Bolloré Transport & Logistics Burkina Faso is  **in full compliance with**  
 in substantial compliance with Transport Practice 3.5  
 not in compliance with

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

The transporter's ERP stipulates that a review of the plan be done at least on an annual basis. To enable reviews to be made, emergency mock drills are held at least annually.

Bolloré's Transport Management Plan and Emergency Response Plan require that emergency drills be held at least once per year. Emergency drills are held to evaluate for compliance with the ER Plan, the response time, whether procedures are still applicable / /adequate, equipment is appropriate and personnel still acquainted with emergency requirements.

Drivers, Convoy Leaders and where available external emergency responders participate in cyanide emergency mock drills.

Debriefs are undertaken following the annual mock drills that identify a requirement for improvements. Observations made during these drills are recorded, assessed for compliance with the ER Plan, and if required, recommendations for improvement made.

The ERP stipulates that a review of the plan be done as a result of changes to conditions along the routes travelled, observations made during accidents / incidents or after a significant incident or after a mock drill was held.

End of report.

Bolloré Transport & Logistics  
Name of Facility

  
Signature of Lead Auditor

15<sup>th</sup> August 2019  
Date