

EXCELLENCE FREIGHTS

*Cyanide Code
Transportation Pre-Operational
Audit*

Summary Audit Report

PROJECT NO. 0357188

SEPTEMBER 2016

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SUMMARY AUDIT REPORT

1 GENERAL SUMMARY

1.1 INFORMATION ON THE AUDITED OPERATION

Name of Cyanide Transportation Facility: Excellence Freights
Name of Facility Owner: Excellence Freights
Name of Facility Operator: Excellence Freights
Name of Responsible Manager: Noel Reyes Baldomero
Address: Claveles # 14, Col. Bello Horizonte, Tultitlan 54948
State/Province: State of Mexico Country: Mexico
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Location detail and description of operation:

Excellence Freights S.A. (Excellence Freights) is a company specialized in the transport and storage of hazardous materials. Excellence Freights also provides sodium cyanide transportation services in Mexico.

Excellence Freights will serve several ground transport routes in Mexico including from port to client site, from production site to client site, from production site to port. There will be no interim storage facilities in the routes to be operated by Excellence Freights

This audit comprises the ground transportation operations from the moment the production facility or the port places the container on the trailer to its deliver at the destination.

Cyanide is received from the manufacturer or consigner in either of the following packaging presentations.

The containers and iso-tanks will be received locked and tagged. These tags will be removed only at the destination site.

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1.2 OVERALL AUDITOR'S FINDING

This operation is

- in full compliance
- in substantial compliance *(see below)
- not in compliance

with the International Cyanide Management Code.

* For cyanide transportation operations seeking Code certification, the Corrective Action Plan to bring an operation in substantial compliance into full compliance must be enclosed with this Summary Audit Report. The plan must be fully implemented within one year of the date of this audit.

Audit Company: ERM Mexico, S. A. de C. V.

Audit Team Leader: Juan Carlos Rangel Lopez E-mail: juancarlos.rangel@erm.com

Names and Signatures of Other Auditors: Oswaldo Diaz

Date(s) of Audit: 30 June 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 Verification Protocol for Cyanide Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

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2 EXCELLENCE FREIGHTS REPORT

This operation is

- in full compliance
- in substantial compliance
- not in compliance

with the International Cyanide Management Code.

2.1 TRANSPORT: TRANSPORT CYANIDE IN A MANNER THAT MINIMIZES THE POTENTIAL FOR ACCIDENTS AND RELEASES

2.1.1 Transport Practice 1.1: Select cyanide transport routes to minimize the potential for accidents and releases.

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 1.1
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

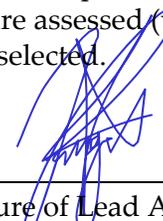
Excellence Freights has developed the procedure PAC-916 "Routes Identification, Assessment and Selection" (herein after the Route Assessment Procedure) Rev. 2 Dated 9 June 2016.

This procedure establishes that the route selection must be coordinated with the client and, when possible, an alternative route must be identified. The route must be assessed by identifying risk related to:

- Robbery
- Population density
- Physical conditions of the road
- Slopes, curves, bridges, tunnels, intersections
- Urban areas
- Water bodies (rivers, lakes, lagoons, wetlands) and fog zones.
- Available communication means (mobile phone, GPS, etc.)

The procedure requires an inspection of the route (which is video-recorded), then an assessment of the risk identified based on consequence and probability. The risks are classified as low, moderate, and high. All potential routes are assessed (when there is more than one available) and then the route with the lower risks is selected.

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The route assessment is valid for one year, with a maximum additional period of three months to complete the new assessment.

The results of the assessment for the selected route are recorded in an instruction sheet, which includes the risk levels for road conditions, natural hazards, security, water bodies, phone signal, and urban areas for specific road segments. It also includes the maximum driving hours and authorized stops. Additionally, all the risks (e.g. potholes, curves, water bodies, etc.) have been uploaded to the GPS tracking system, which has a voice system that alerts the driver.

According to Route Assessment Procedure, feedback from the stakeholders will be requested; this is the responsibility of the Logistics Director and the Ground Transport Manager. They will establish contact through phone, visits, and email. The interactions will be recorded in minutes and during these interactions Excellence Freight will provide training and safety data sheets.

The use of convoys is banned by Mexican regulations. The security risks identified are controlled by establishing only diurnal driving hours and by GPS tracking, which includes a panic button.

According to Route Assessment Procedure, external responders, medical facilities and authorities are regarded as stakeholders. They will be contacted by Excellence Freight personnel to provide them emergency response training. When practical, Excellence Freight will aim to complete these interactions along with representatives from the manufacturer.

Excellence Freight will not subcontract any transport operation.

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.

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 1.2
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

At the time of the audit, Excellence Freight had designated personnel for the cyanide transport operations (i.e. drivers and assistants). Excellence Freight has established a procedure to hire personnel for these activities.

The procedure states that drivers must be qualified and includes the following requirements:

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- Federal Driver License E (drivers for hazardous material transport units);
- Certificate of psycho and physical abilities (issued by the SCT);
- Two years of experience in hazardous materials transport;
- One year of experience in sodium cyanide handling (desirable).

Additionally, Excellence Freights has established a training program for the workers involved in sodium cyanide transport operations. The training program includes the following topics:

- Risk prevention in transport;
- Fatigue management in transport;
- Consequences of drug use in drivers;
- Fuel economy in trucks;
- Emergency response in events related to sodium cyanide;
- Defensive driving;
- Speed control;
- Hazardous materials handling and transport; and
- Safety and contingencies in route.

The program establishes that these topics must be covered before the drivers can participate in cyanide transport operations. Additionally, Excellent Freights will provide refreshment training, including the above mentioned topics, on a yearly basis.

Excellence Freights has committed to keep training records on-site for up to five years after the drivers have left the company.

Furthermore, in order to ensure the success of the training program and the emergency response, Excellence Freights has commissioned a local specialized company to provide sodium cyanide training. This program will include the following topics:

- Hazardous materials
- Sodium cyanide
- Personal protective equipment

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- Information source management (SDS)
- Patient decontamination
- Attention to patients intoxicated with sodium cyanide

This program will include an emergency response mock drill.

Excellence Freights will not subcontract any transport operation.

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

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 1.3
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Excellence Freights will transport cyanide via truck within ocean containers. Excellence Freights has used the client cyanide requirements to determine the accurate equipment to ensure that the cyanide load is within the bearing limits of the units.

At the time of the audit, Excellence Freights was equipped with three trucks and eight trailer platforms. Specifications were reviewed on-site. The load was verified to be within the bearing limits of the trailer and the hauling limits of the truck (80 ton). The maximum assembly weight will be approximately 61.4 ton.

Excellence Freights complies with the Official Mexican Standard NOM-012-SCT-2014, which establishes that the maximum bearing limit is 75 ton.

Additionally, Excellence Freights has the procedure PAC-925 which establishes the maintenance program for the transport units. The procedure states that preventive maintenance is to be

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conducted on trucks every 30,000 km. Excellence Freights has an agreement with a truck dealer company for the maintenance of the units.

Preventive maintenance includes oil and engine filter changes. Additionally, the procedure establishes a verification list which includes the following items, among others:

- Lights
- Internal lights
- Battery
- Ignition system
- Banners
- Signaling diamonds
- Main chassis components
- Superior structure
- Inferior structure
- Bumpers
- Fuel tank

Excellence Freights has a maintenance program for trailers. This program is conducted once a year. This program includes a verification list, which includes:

- Banners
- Signaling diamonds
- Rollerblades
- Superior structures
- Hits or dents
- Bumpers
- 7 way cable connection
- Valve box
- Kingpin and trailer platform conditions
- Hook conditions
- Among others

Excellence Freights has the procedure PAC-933 which establishes that tires inspection must be conducted on a monthly basis. This will include a visual inspection and grooving/tread depth measurement. The procedure states that the minimum grooving depth is 5 mm. The procedure also states that all tires must be replaced with new ones.

Each truck will be equipped with a trip log. The log includes a visual inspection of the unit (including truck and trailers) according to the NOM-006-SCT2-2011. Operators will be required to conduct this inspection daily and to register it in the logbook.

The procedure PAC-931 establishes the requirements for approving suppliers. This procedure

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states that the supplier must be direct dealer of the equipment brands to be repaired. Excellence Freights has selected a company based on this procedure.

Excellence Freights informed that operations will not include the use of forklifts or cranes as their responsibility will start once the container is on their platform.

Excellence Freights will have trucks with the capacity to haul two trailers together and its trailers can only carry one container.

Excellence Freights will not subcontract any transport operation.

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

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 1.4
- not in compliance with

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Summarize the basis for this Finding/Deficiencies Identified:

According to the interviewed personnel, cyanide will be handled in containers; these will be locked and tagged at the production facility. Excellence Freight personnel will not be authorized to open the containers. The ocean containers will be filled to their maximum capacity to prevent lateral movement.

Excellence Freight uses an inspection checklist as part of the driver's daily logbook for all their transport operations. The checklist includes over 50 safety inspection points for the truck and the trailer. This includes also the use of the safety placards

Excellence Freights has the procedure PAC-925 which establishes the maintenance program for the transport units. The procedure states that preventive maintenance is to be conducted on trucks. Excellence Freights has an agreement with GOMSA Camiones S.A. de C.V. for the maintenance of the units.

Preventive maintenance includes oil and engine filter changes. Additionally, the procedure establishes a verification list which includes items mentioned in the Transport Practice 1.2.

The procedure PAC-925 establishes that inspections of the trailers will be conducted once a year.

Excellence Freights has the procedure PAC-933 which establishes that inspection to the tires will be conducted. This will include a visual inspection and grooving/tread depth measurement. Tire inspection is also included as part of the daily safety inspection.

The instructions sheet that summarizes the risks identified along the route includes the limitation in driving hours. It establishes that there must be at least 1 hour of rest per every 2.5-3 hours of driving. These limitations are based on the characteristics of the route and the product. The driving hours are recorded in the driver's daily logbook.

The GPS monitoring system operator will review wind and other weather conditions in the area where this risk has been identified and instruct the driver prior to this area to stop at the designated area or to continue. Information on road blockages is shared by other drivers and the GPS service provider. This information will be used to stop or postpone operations as well.

Excellence Freights has an alcohol and drugs prevention policy that prohibits the use consumption of drugs and alcohol within their facilities, those of their clients and during the performance of any activity related to the company. Additionally, every year 100% of their operative personnel are tested for drugs consumption. Furthermore, random drugs test are performed to any person accessing to their facilities. Results are kept in the clinical files. Results are also reported to the Transport Authority.

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Excellence Freight has the procedure PAC-155 for record control; this establishes that each area establishes the minimum time for the retention of records in file and then in archive. The records related to cyanide code are kept one year on file and 3.5 years in archive.

Excellence Freights will not subcontract any transport operation.

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

The operation is

THIS PRACTICE DOES NOT APPLY TO THE TRANSPORTER

- in full compliance with
- in substantial compliance with Transport Practice 1.5
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

As described in Section 1, the scope of this audit is only for the ground transportation operations performed by Excellence Freights; therefore this practice is not applicable.

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

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 1.6
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

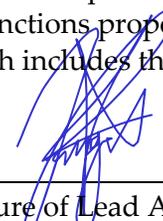
As part of Excellence Freights operations, all trucks are equipped with pagers which enable drivers to communicate with Excellent Freights, the mining operation, and the cyanide producers. The trucks are also equipped with an internal mobile phone and a hybrid satellite system.

Additionally, drivers are provided with mobile phones.

Excellence Freights has a GPS tracking system named MiCopiloto, which enables to track the truck location and communicate with the drivers.

Excellence Freights has developed the IOT-004T procedure for the inspection/testing of the communication equipment to ensure it functions properly. Inspections are conducted randomly. The inspection is based on checklist, which includes the following items:

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- Panic button
- Engine stop system
- Acceleration stop system
- Pager (keyboard)

The inspection includes detailed steps to verify the proper function of the equipment and systems. In case that malfunctioning is detected, Excellence Freights requires tech support from the equipment manufacturer.

According to the PAC-916 procedure, blackout areas are identified during the evaluation of a route. According to every route, all blackout areas are identified, including the estimate time to leave the area. Approximately five km prior to the blackout area, the MiCopiloto system informs the monitoring personnel. The monitoring personnel contact the driver. The driver communicates with the monitoring personnel once the shipment has left the blackout area. Excellence Freights has established a tolerance of 15 minutes to contact the truck. If the driver has not communicated after this time, an emergency protocol is activated to locate the shipment.

Excellence Freights has developed the procedure PAC-915 to track cyanide shipments. The procedure states the use of the GPS tracking system named MiCopiloto. This system enables Excellence Freights to track the location, speed, and stops of the trucks.

Additionally, the trucks are equipped with an internal mobile phone and a hybrid system in case of blackout areas.

Two personnel are designated to track the location of the cyanide shipments. The procedure states that if a stop or route deviation is detected, the monitoring personnel are required to contact the driver through the internal phone or the driver's phone.

The procedure includes a data base of risky areas, blackout areas, interest sites (i.e. client sites, plants, gas stations, authorized stops). Furthermore, the procedure establishes that all the information regarding the shipment tracking must be saved on a daily basis. Activity reports are saved on a monthly basis.

The procedure establishes the response to blackout areas which involves notification prior to entering the blackout area (previously identified) and to wait for a response once the truck has left the area in the established time with a 15-min tolerance time.

The procedure also establishes a speed limit of 80 kph.

As established in the PAC-915 procedure, while a sodium cyanide transport trip is in progress, the Operation Supervisor is informed of the trip progress. In case that the client requires further

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information, the Operation Manager or Supervisor determines which information will be provided.

As required by the Official Mexican Standard NOM-004-SCT, a bill of lading is issued by the cyanide supplier which includes the number of the container, the net content, and customer information. Excellence Freights has developed the procedure PAC-914 for the reception and delivery of cyanide. The procedure establishes that the drivers must ensure to review the loadings and to carry them at the unit.

The containers will be received locked and tagged. These tags will be removed only at the destination site.

As established by the PAC-914 procedure, the bill of lading and the MSDS must be carried by each driver.

Excellence Freights will not subcontract any transport operation.

2.2 INTERIM STORAGE: DESIGN, CONSTRUCT AND OPERATE CYANIDE TRANSPORTING DEPOTS AND INTERIM STORAGE SITES TO PREVENT RELEASES AND EXPOSURES.

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

The operation is:

THIS PRACTICE DOES NOT APPLY TO EXCELLENCE FREIGHTS

- in full compliance with
- in substantial compliance with Transport Practice 2.1
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Excellence Freights will not operate an interim storage, this practice is not applicable.

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2.3 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.

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 3.1
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Excellence Freights has prepared an Emergency Response Plan (Plan Para la Atención de Emergencia en el Transporte de Cianuro) PAC-936 dated 5 August 2016. This is a 23 page document that establishes responsibilities for different roles within Excellence Freights organization.

The Emergency Response Plan includes emergency response instructions for the different scenarios that according to their route assessment could take place. This includes truck crashing with and without product spill as well as scenarios where the truck driver is hurt and cannot participate in the emergency response. Also, the specific instructions for the different emergency scenarios relate to ground transport of hazardous materials. It includes prevention and mitigation instructions, as well as specific response instructions.

The Emergency Response Plan includes also emergency response instructions for the scenarios involving solid state cyanide spills.

The Emergency Response Plan is based on the route risk assessment which includes the identification of the road conditions and characteristics (steep slopes, curves, bridges, traffic intensity) in different sections of the route.

Excellence Freights transports hazardous materials only in trucks with couplings containers or isotanks.

The response instructions for the different scenarios were prepared indicating first the position that is responsible for executing that action. The instructions include the responsibilities of the different Excellence Freights employees as well as those for the Federal Police, Red Cross and the municipal Civil Protection Agencies. Additionally, there is a section that describes the different roles for other external responders (e.g. local industrial support groups or the client brigade in case they become involved).

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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
- in substantial compliance with Transport Practice 3.2
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

As mentioned in practice 1.2, the training program includes the following topics: hazardous materials handling, defensive driving, personal protective equipment, and managing of sodium cyanide and related emergencies (spillage and cyanide poisoning), among others.

Additionally, Excellence Freights will complete at least one mock emergency drill per year and will look for the participation of the cyanide manufacturer and the client. Personnel to be trained include drivers, monitoring personnel and operations supervisor.

Excellence Freights has developed the PAC-936 procedure, which establishes the emergency response measures for the handling of cyanide. This procedure states the roles and responsibilities of Excellence Freights staff in case of emergency.

Annex 11 of the Emergency Response Plan includes a list of emergency equipment and personal protective equipment to be transported by each truck and that to be transported by the emergency brigade, and comprises the following:

Per truck:

- Safety shoes
- One pair of leather gloves
- One pair of chemical resistant gloves
- Safety glasses
- High visibility vest
- Hard hat
- Danger tape
- Dry chemical dust extinguisher
- Shovel

Emergency Brigade

- Truck
- Type A suits

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- 2 Scuba units with two spare tanks each
- 1 tube for decontamination water recovery
- 2 empty drums
- 50 kg of lime
- 1 absorbent material kit
- First aid kit
- Wind indicator
- radios

The Emergency Response Plan establishes that the emergency equipment must be carried by prior to the departure of each vehicle. The inspection will be recorded using an inspection form. Also, the Emergency Response Plan establishes that the emergency equipment must be inspected prior to each transport operation. A checklist will be used to verify that it is available.

As mentioned in the Transport Practice 1.2, Excellence Freights has a training program to be provided when the drivers are hired and on a yearly basis. The training will consider at least the following: risk prevention in transport, fatigue management in transport, consequences of drug use in drivers, fuel economy in trucks, emergency response in events related to sodium cyanide, defensive driving, speed control, hazardous materials handling and transport, and safety and contingencies in route.

Furthermore, in order to ensure the success of the training program and the emergency response, Excellence Freights has commissioned UNCA to provide the sodium cyanide training program. This program will include the following topics: hazardous materials, sodium cyanide, personal protective equipment, information source management (SDS), patient decontamination, and attention to patients intoxicated with sodium cyanide

Additionally, Excellence Freights will perform mock emergency drills. Personnel to be trained include drivers, monitoring personnel and operations supervisor.

Excellence Freight will not subcontract the cyanide transport.

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

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 3.3
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Emergency Response Plan includes a list of external responders and other organizations that must be notified in case of an emergency.

The emergency notification and reporting instructions are included within the Section 6 of the Emergency Response Plan. Section 10 of the plan states that it must be reviewed at least once per year.

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

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 3.4
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The Emergency Response Plan includes general instructions for the handling of solids and liquids in case of a spill as well as decontamination and neutralization of soil using lime. It also establishes that all debris and waste must be handled as hazardous waste.

Section 6.7.8 of the Emergency Response Plan establishes that it is forbidden to use any chemical product including sodium hypochlorite, iron sulfate and hydrogen peroxide to any waterbody.

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

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 3.5
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Section 10 of the Emergency Response Plan establishes that the plan must be assessed through two emergency drills per year (one desk top and one in the field). A drill assessment form will be used to record the drill results. Based on the drills results the Plan must be modified if needed.

Also, establishes that it must be reviewed after every emergency drill and at least once per year.

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