

# SUMMARY AUDIT REPORT

Name of Cyanide Transportation Facility: PT Energy Logistics (PT. EL)

Name of Facility Owner: Mr Chadi Nehme (President Director)

Name of Facility Operator: Mr Chadi Nehme (President Director)

Name of Responsible Manager: Mr Gerard Quillien (Senior Technical Advisor)

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Location detail and description of operation:

## Overview

### **Inbound shipments of cyanide containers are as follows:**

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Transportation of solid sodium cyanide from International Port of Surabaya (Terminal Petikemas Surabaya), Indonesia by road to Port Perak (Domestic Port of Surabaya), Indonesia by PT HacacaSetioAbadi. Sea transportation from Port of Perak to Port of Bitung, Indonesia by PT Meratus Line and PT TantoIntim Line. Road transportation from Port of Bitung interim storage (Terminal PetikemasBitung) to mine sites by PT Energy Logistics to gold mines located in Bakan, Lanut and Tokatindung. The distance between Surabaya International port to Perak Domestic port is 3.3 km and the transport is within boundaries Port.

### **Outbound shipments of cyanide containers**

The reverse freight management to transport and shipped unclean empty cyanide containers applies for storage at TPS.

Name of Facility: PT Energy Logistics

Signature of Lead Auditor

Date  
1 Dec 2017

& Technical Expert



# SUMMARY AUDIT REPORT

## *Auditor's Finding*

This operation is

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

with the International Cyanide Management Code.

## **Scope of Verification Audit**

Transportation of solid sodium cyanide from International Port of Surabaya (Terminal Petikemas Surabaya), Indonesia by road to Port Perak (Domestic Port of Surabaya), Indonesia by PT Hacaca Setio Abadi. Sea transportation from Port of Perak to Port of Bitung, Indonesia by PT Meratus Line and PT Tantalintim Line. Road transportation from Port of Bitung interim storage (Terminal Petikemas Bitung) to mine sites by PT Energy Logistics to gold mines located in Bakan, Lanut and Tokatindung. The distance between Surabaya International port to Perak Domestic port is 3.3 km and the transport is within boundaries Port.

Audit Company: Danny Tan

Audit Team Leader and Technical Expert: Mr Danny Tan

E-mail: dannytan163@yahoo.com.sg

Names and Signatures of Other Auditors:

Date(s) of Audit: Audit Dates: 10 to 14 Aug 2017

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

Name of Facility: PT Energy Logistics

Signature of Lead Auditor

Date  
1 Dec 2017

& Technical Expert



# SUMMARY AUDIT REPORT

Code Verification Protocol for Cyanide Transportation Operations and using standard and accepted practices for health, safety and environmental audits.  
Transport Practice 1.1: Select cyanide transport routes to minimize the potential for accidents and releases.

in full compliance with

The operation is  in substantial compliance with Transport Practice 1.1

not in compliance with

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

## **Land transport from Port of Bitung to Bakan, Lanut and Toktindung**

PT. EL conducted a comprehensive route assessment for Bitung operations to the three mines sites. Based on documented records and on site verification, selection of route were based on the minimizing the potential accidents and releases or the potential impacts of accidents with due consideration given for the following:

- a) traffic conditions,
- b) road conditions,
- c) environmental impacts
- d) community relations and reactions
- e) daily commuting habits

Based on the route selected, PT. EL conducted a route risk assessment in accordance with established procedure (MP-CMS-05 Route Selection) covering

- a) Population Density
- b) Infrastructure construction and condition
- c) Pitch and grading
- d) Prevalence and proximity of water bodies and fog

These procedures address the evaluation of risks in the selection of the cyanide transportation routes with appropriate risk management controls. A process on collecting feedback on route condition from the PT. EL drivers was verified in accordance with implemented route assessment procedure. Community consultation from local police, port authorities and village chiefs for Bitung route to mine sites was conducted as part of the route assessment.

Local police escorts and own transporters played the critical roles as both external and internal responders in notifying respective medical facilities and communities' communications during an emergency or in the event of safety and security incidents. This arrangement enhances the integrated respond and alertness required which demonstrated during audit interviews. Cyanide transport is always transported in convoys and security escort is assured by the local Police.

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Route risk assessment for the respective routes to mine sites were cited and verified for implemented risk controls measures aligned with identified risks.

1. Route risk from Port of Bitung to Bakan dated 16 Jul 2017
2. Route risk from Port of Bitung to Lanut dated 19 Apr 2017
3. Route risk from Port of Bitung to Tokatindung dated 13 Oct 2016

## **Land Transportation from TPS to Surabaya Tanjung Perak Domestic seaport**

PT. EL subcontracts PT Hacaca to transport laden cyanide containers from TPS to Surabaya Tanjung Perak Domestic seaport. Route risk assessment was conducted in accordance with established procedure (MP-CMS-05 Route Selection) from Surabaya International to Domestic Port to Tanjung Perak Domestic seaport located within the port limits to ascertain the required control measures in mitigating identified road transportation risks. Interview held with Hacaca's operations staff was conducted to verify that compliance with the Code requirements for transportation.

PT. EL had implemented due diligence procedure – MP/CMS/013 revised on 28 Aug 2017 to ensure that subcontractors continue to make compliance with ICMC requirements. Due diligence investigations (DDI) were scheduled for three years. DD1 record conducted for PT Hacaca on 11 July 2017 was verified and no significant lapses were noted.

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# SUMMARY AUDIT REPORT

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

The operation is  in substantial compliance with Transport Practice 1.2

not in compliance with

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

PT. EL ensures that all drivers assigned including PT Hacaca possess the required driving license in accordance with local applicable provincial similar requirements.

MP-CMS-12 Training procedure had been established that assigned cyanide transportation drivers meet the required training and qualifications including licensing of drivers.

Assigned drivers by PT. EL were trained on the specifics of cyanide handling and transportation to address competency requirements during a cyanide transport incident. Training records and appropriate materials were reviewed to ascertain the relevancy and applications. Interviews held with trainer and designated driver are evident that driver are trained in this aspect and related requirements.

### **Sea Transportation (TPS to Bitung domestic seaport)**

PT. EL subcontracts PT Meratus Line and PT Tanto Intim Line commercial vessel for sea transportation from TPS to Port of Bitung. Interview held with PT Meratus Line and PT Tanto Intim Line operations staff verified that assigned sea crews were trained on the specifics of cyanide handling and transportation. Training records and appropriate materials were reviewed to ascertain the relevancy and applications. PT. EL had implemented due diligence procedure MP/CMS/013 revised on 28 Aug 2017 to ensure that subcontractors continue to make compliance with ICMC requirements. Due diligence investigations' (DDI) records conducted as follows were verified and no significant lapses were noted.

1. DDI for PT Meratus dated on 13<sup>th</sup> Jul 2017
2. DDI for PT Tanto Intim Line on 14<sup>th</sup> Jul 2017

MP-CMS-12 Training procedure was established of which PT. EL and PT Hacaca will conducts joint training for both initial qualifications and annual refresher for assigned drivers for cyanide land transportation. Training records and scheduled were verified for assigned drivers.

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# SUMMARY AUDIT REPORT

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

in full compliance with

The operation is  in substantial compliance with Transport Practice 1.3

not in compliance with

## *Summarize the basis for this Finding/Deficiencies Identified:*

PT. EL ensures that assigned vehicles including PT Hacaca only deploys appropriate equipment, which is designed and maintained to operate within the permitted loads of cyanide shipments. Verification was made along with implemented procedures and observation on site during interview held with PT. EL and PT Hacaca staff and assigned driver in accordance with records of vehicles specifications. Vehicle checklists pertaining to transportation from TPS to Tanjung Perak Domestic Seaport, from Bitung to three respective mine sites were reviewed as reflected in MP-CMS-08 Maintenance of Truck and trailers. Convoy truck and trailer pre-departure checklist for the month of March were verified without significant lapses and indicative that assigned vehicles were maintained and operate within the loads it will be handling for cyanide road transportation.

The weight of cargo of each container is 20 Tons as indicated in the Bill of Lading (20 bags of 1 Ton each) as reflected in procedure (MP-CMS-06 Convoy Delivery of Sodium Cyanide Rev1) to make sure that the container weight does not exceed the truck capacity.

### **Sea Transportation (TPS to Bitung domestic seaport)**

PT. EL subcontracts PT Meratus Line and PT Tanto Intim Line commercial vessel for sea transportation from TPS to Port of Bitung. Interview held with PT Meratus Line and PT Tanto Intim Line operations staff verified that vessels assigned deploys appropriate equipment, which is designed and maintained to operate within the permitted loads of cyanide shipments. PT. EL had implemented due diligence procedure MP/CMS/013 revised on 28 Aug 2017 to ensure that subcontractors continue to make compliance with ICMC requirements. Due diligence investigations' (DDI) records conducted as follows were verified and no significant lapses were noted.

1. DDI for PT Meratus dated on 13<sup>th</sup> Jul 2017
2. DDI for PT Tanto Intim Line on 14<sup>th</sup> Jul 2017

Records of planned maintenance schedule for assigned transportation were reviewed in accordance with MP-CMS-08 Maintenance of Truck and trailers. These were indicative that assigned transportation was maintained and acceptable conditions as required by local authorities.

Processes and procedures are in place to ensure that transportation process uses only preapproved pool of prime movers with specially designed chassis to mitigate the risk of overloading. Preventive maintenance programme are in place as verified as part of operation's routine and preventive maintenance regime. Vehicle maintenance records for the month of Jun and July 2017 were reviewed and verified without significant lapses as per PEL's routine and preventive regime.

### **Land Transportation from TPS to Surabaya Tanjung Perak Domestic seaport**

PT. EL subcontracts PT Hacaca to transport laden cyanide containers from TPS to Surabaya Tanjung Perak Domestic seaport. On site verification conducted is evident that sampled vehicles meet the stated requirements road transportation are suitable and appropriate for cyanide road transportation.

PT. EL had implemented due diligence procedure – MP/CMS/013 revised on 28 Aug 2017 to ensure that subcontractors continue to make compliance with ICMC requirements. Due diligence investigations (DDI) were scheduled for three years. DD1 record conducted for PT Hacaca on 11 July 2017 was verified and no significant lapses were noted.

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Name of Facility: PT Energy Logistics

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# SUMMARY AUDIT REPORT

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

in full compliance with

The operation is  in substantial compliance with Transport Practice 1.4

not in compliance with

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

PT. EL had established procedures to ensure integrity of product within sealed GP containers from port of origin. The product is not unloaded or tampered with while in transport until final destination to mine sites as reflected in MP/CMS/06 – Convoy Delivery of Sodium Cyanide Class 6.1 dated 28 Apr 2014.

Container no: RJCUC 8377478 and 8202398 that were used for the transportation of cyanide on 3 Mar 2017 was reviewed indicating the presence of placards and signage UN 1689 and pictorial labels of DG class 6.1 and toxic substance including damage to environment.

Prior to cyanide transports, PT. EL ensures that vehicle inspection prior to each departure.

The following are verified with established MP/CMS/06 – Convoy Delivery of Sodium Cyanide Class 6.1 dated 28 Apr 2014.

- Risk mitigation measures as reflected in hazard risk assessment
- toolbox meeting are conducted for assigned drivers
- Rotating shifts for drivers to ensure sufficient rest for drivers
- Transportation can be modified depending on external conditions during foul weather
- Prevention of loads from shifting during transportation
- Alcohol test are being conducted

Implemented safety programs were established for the safe transportation commensurate with local operating conditions. Overall, verified documented records including vehicle inspection checklists and on site assessment and interviews held with PT. EL and PT Hacaca demonstrated respective compliance.

## **Sea Transportation (TPS to Bitung domestic seaport)**

PT. EL subcontracts PT Meratus Line and PT Tanto Intim Line commercial vessel for sea transportation from TPS to Port of Bitung. Due diligence interview was conducted with relevant records to ascertain the relevancy and compliance. There is no manipulation of the packing as the tank containers are sealed and not opened. PT. EL had implemented due diligence procedure MP/CMS/013 revised on 28 Aug 2017 to ensure that subcontractors continue to make compliance with ICMC requirements. Due diligence investigations' (DDI) records conducted as follows were verified and no significant lapses were noted.

1. DDI for PT Meratus dated on 13<sup>th</sup> Jul 2017
2. DDI for PT TantoIntim Line on 14<sup>th</sup> Jul 2017

## **Land Transportation from TPS to Surabaya Tanjung Perak Domestic seaport**

PT. EL subcontracts PT Hacacato transport laden cyanide containers from TPS to Surabaya Tanjung Perak Domestic seaport. Cyanide shipments are identifiable by DG placards required for cyanide transportation Due diligence interview and records verified to ascertain the relevancy and compliance. PT. EL had implemented due diligence procedure – MP/CMS/013 revised on 28 Aug 2017 to ensure that subcontractors continue to make compliance with ICMC requirements. Due diligence investigations (DDI) were scheduled for three years. DD1 record conducted for PT Hacaca on 11 July 2017 was verified and no significant lapses were noted.

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# SUMMARY AUDIT REPORT

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

in full compliance with

The operation is  in substantial compliance with Transport Practice 1.5

not in compliance with

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

## **Sea Transportation (TPS to Bitung domestic seaport)**

PT. EL subcontracts PT Meratus Line and PT TantoIntim Line commercial vessel for sea transportation from TPS to Port of Bitung. PT. EL had implemented due diligence procedure MP/CMS/013 revised on 28 Aug 2017 to ensure that subcontractors continue to make compliance with ICMC requirements. Due diligence investigations' (DDI) records conducted as follows were verified and no significant lapses were noted.

1. DDI for PT Meratus dated on 13<sup>th</sup> Jul 2017
2. DDI for PT TantoIntim Line on 14<sup>th</sup> Jul 2017

Due diligence review was conducted on site with staff of PT Meratus Line and PT Tanto Intim Line to verify compliance with the prevailing IMDG code. At the point of audit, the following were verified for compliance:

- Both shipping lines' staff interviewed on site was able to verify compliance of DG shipments with the applicable IMDG Code requirements.
- Packaged as required by Part 4 of the IMDG Code and according to the packaging instructions and packaging provisions indicated on the DG List. Based on representative shipments samples compliance was demonstrated.
- Not applicable for Section 5.2.1 and 5.2.2 of the IMDG code as cyanide is being shipped in form of intermediate bulk containers (IBCs) stored inside GP containers
- Cyanide shipments were sampled with documents and appropriate records to verify that shipments are identified with required placard and marked as required by Chapter 5.3 of the IMDG Code
- Sampled dangerous goods transport document verified with records demonstrated compliance with requirements under Chapter 5.4 of the IM DG Code.
- Not applicable for Section 5.4.2 of the DG code as the cyanide is packaged by producer as well as for outbound empty tank containers.
- Vessel carrying the cyanide containers had a manifest identifying the presence of the cyanide. Based on the manifest the container location can be checked with the detailed stowage plan. Both documents complement and conform to Section 5.4.3.1 of the DG Code.
- Vessel carrying the cyanide containers was found to have an Emergency Response Plan in place.

Overall, PT Meratus Line and PT Tanto Intim Linewere found to be in compliance with the stowage and separation requirements of Part 7 of the IMDG Code concerning cyanide shipments.

PT. EL does not transport cyanide by air transportation.

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# SUMMARY AUDIT REPORT

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

in full compliance with  
The operation is  in substantial compliance with Transport Practice 1.6  
 not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*  
**(Due to the sensitivity of security issues regarding storage of cyanide, no descriptions of substantial or non-compliance with this aspect of the Transport Practice should be provided.)**

MP-CMS-09 Inventory Control & MP-CMS-04 Tracking and Communications outline the respective procedures and processes to track shipments to prevent losses during transport. PT. EL ensures that transport vehicles to have in place mobile phones to enable two way communications between escort vehicles with control depot and branch manager

Records of monitoring and testing of communication system was conducted on 3 Mar 2017 prior to departure and during land transportation from Bitung Port Mine site in accordance with PT. EL Inventory Control procedure MP/CMS/09. Checklists were verified and till date communication system was found to be functionally well. Toolbox meeting was conducted prior to departure to all personnel. This integrated system helps to mitigate the risk of communication blackouts and feedback for system review and ongoing risk assessment.

Verification made with records of GPS monitoring and tracking for cyanide for both routes including interview held with assigned driver on the implementation of this procedure. PT. EL had implemented PT. EL Inventory Control procedure MP/CMS/09. Records of GPS tracking was verified for land transportation conducted on 3 Mar 2017. Shipments inventory controls are in place to prevent loss of cyanide shipments during land transportation as verified with cargo management records. There are no transfers of shipments during the entire of land transportation.

On site audit on route assessment and interviews with PT. EL staffs were held. Along with respective delivery orders, chain of custody procedural controls and accompanying Material Safety Data Sheets (MSDS) verified with shipments records; are indicative that system is in place to ensure tracking of cyanide shipments and loss prevention. Shipping records for cyanide transportation on 3 Mar 2017 were verified with bill of lading and associated MSDS and was indicative the amount of cyanide during the cyanide transportation from TPS to mine sites.

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Signature of Lead Auditor

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# SUMMARY AUDIT REPORT

## **2. INTERIM STORAGE: Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.**

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

in full compliance with

The operation is  in substantial compliance with Transport Practice 2.1

not in compliance with

### *Summarize the basis for this Finding/Deficiencies Identified:*

The interim storage is situated within the International Port of Surabaya and Port of Bitung. Warning signs are visible in both Indonesian and English language at the entrance of the DG yard as reviewed during the onsite visit to Surabaya and Bitung designated DG yard. Security is being ensured with security post managed by outsourced security services as observed during on site visit. Visitors access control is in place and monitored for entrance to DG yard including areas designated for cyanide storage.

Segregation of cyanide storage in DG yard managed by port authorities as observed during on site visit to DG yard in accordance with DG location plan as part of safety management plan for DG storage. Cyanide is being stored outdoor which is designed for DG storage managed by both Surabaya and Bitung port authorities. Cyanide containers remain sealed at all times while at the port as verified per SOP MP-CSM-11 for Interim storage.

Cyanide is stored outdoor which is designed for DG storage managed by both Surabaya and Bitung port authorities providing effective and adequate ventilation. Process and systems are in place to contain the volume of largest single drum of cyanide in the vent of spillage occur within DG yard.

#### **Note:**

The Due Diligence Investigation for TPS also covers Port Perak BTJI Surabaya, as cyanide is loaded directly from trucks to vessels at Port Perak BTJI Surabaya with no storage, and that the same controls and systems are in place as at TPS, through use of the same management system for Hazardous Materials.

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Name of Facility: PT Energy Logistics

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# SUMMARY AUDIT REPORT

## **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.

in full compliance with

The operation is  in substantial compliance with Transport Practice 3.1

not in compliance with

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

MP-CMS-10 Emergency Response Plan highlights established emergency response plan (ERP) for 5 risk scenarios was established as follows:

- Spill in containers
- Sea container's contamination in sea containers
- handling work
- dry sodium cyanide in soil
- dry containers in water

The above identified risk scenarios were clearly aligned with identified risk areas in the route assessment. Respective classifications of incidents correspond with incident response structure resulting from the outputs provided by the PT. EL hazard risk assessment. PT. EL ERP taking into accounts the physical and chemical form of cyanide during accidental release and plans are reflective to provide due considerations. Cyanide that are transported are Solid Sodium Cyanide (NaCN briquettes) as per the attached MSDS and reflected in Bill of Lading.

PT. EL had developed the ERP giving due considerations the various nodes of supply chain in accordance with the scope of verification as follows:

- land transportation from Bitung to mine site

PT. EL had conducted risk assessment for 5 risk scenarios was established as follows:

- Spill in containers
- Sea container's contamination in sea containers
- handling work
- dry sodium cyanide in soil
- dry containers in water

PT. EL considered the design of when developing the Emergency Response Plan for design of assigned trucks for cyanide transportation.

Respective classifications of incidents correspond with incident response structure taking into account the potential incidents that may occur such as chemical spill during land transportation or within DG yard.

Communications with external responders were established covering integrated response.

Respective roles and responsibilities are being reflected in the implemented ERP covering the mining company and community representatives.

Local police & Fire brigade shall be contacted in case of emergency cyanide spill occurrence as reflected in SOP MP-CMS-10 Emergency Response Procedure rev2. Furthermore local Police escort is being engaged as part of every cyanide transport convoy.

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# SUMMARY AUDIT REPORT

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

in full compliance with

The operation is  in substantial compliance with Transport Practice 3.2

not in compliance with

## *Summarize the basis for this Finding/Deficiencies Identified:*

PT. EL conducts joint training and test and exercises and ERP training was conducted on 22 Sep 2016 covering the characteristics, handling of cyanide during land transportation, usage of personal protective equipment and usage of transportation vehicles. Records were verified and are indicative that due coverage was given for ERP training of appropriate personnel such as drivers. Emergency Response Training is being conducted annually in both Surabaya and Bitung as per verified schedule.

PT. EL jointly established specific emergency response duties and responsibilities of personnel as part of overall ERP plan. The incident response structure is common to all three nodes of supply chain in order to have an effective and timely ERP response in the event of occurrence of incident.

List of equipment is being reflected within the associated checklist and verified with driver prior to departure during tool box meeting.

Emergency response equipment and Personal Protective Equipment reflected within the associated checklist were made available for prior to departure for land transportation. Through interview with PT. EL and this was confirmed as part of verification for the overall conduct of tool box meeting.

PT. EL conducts joint training and test and exercises including development of ERP with emergency responders such as police, hospital, community and mine representatives. ERP training was conducted on 22 Sep 2016 covering the characteristics, handling of cyanide during land transportation, usage of personal protective equipment and usage of transportation vehicles. ERP had been implemented with records of initial training provided for the land transportation on 22 Sep 2017 in accordance with established PT. EL procedure ERP (Cynaide Transport Emergency Response Plan Procedure – MP/CMS/10). Emergency Response Refresh training is given every year based on verified schedule.

PT. EL implemented procedures to inspect ERP equipment as part of pre departure checks mandatory for drivers prior to departure for land transportation.

PT. EL conducts joint training and test and exercises including development of ERP. ERP mock drill was conducted on 22 Sep 2016 with scenario of chemical spill within port DG yard.

Joint training and Emergency response exercise are conducted annually as reflected in drill scenario & drill attendance lists.

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Signature of Lead Auditor

Date  
1 Dec 2017

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# SUMMARY AUDIT REPORT

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

in full compliance with

The operation is  in substantial compliance with Transport Practice 3.3

not in compliance with

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

Procedures established for notification of PT, EL and external response providers. (Reference – PT, EL procedure ERP (Cynaide Transport Emergency Response Plan Procedure – MP/CMS/10).

Systems are in place to ensure that internal and external emergency notification and reporting procedures are kept current such as provision for review of ERP and periodic update of contact information for both internal and external responders such as emergency responders such as police, hospital, community and mine representatives.

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

in full compliance with

The operation is  in substantial compliance with Transport Practice 3.4

not in compliance with

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

Compliance made as PT. EL had a list of external responders (Cynaide Transport Emergency Response Plan Procedure – MP/CMS/10) covering the various aspects of recovery within driver control or disposal of spill clean debris.

Procedure is being established in prohibiting the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water (Cynaide Transport Emergency Response Plan Procedure – MP/CMS/10). This procedure is being reiterated during toolbox meeting as demonstrated during interview with PT. EL staff.

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Signature of Lead Auditor

Date  
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# SUMMARY AUDIT REPORT

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

in full compliance with

The operation is  in substantial compliance with Transport Practice 3.5

not in compliance with

## *Summarize the basis for this Finding/Deficiencies Identified:*

PT. EL make provisions for periodically reviewing and evaluating established ERP continual adequacy to identified hazards and probable scenarios. Cyanide emergency response drill schedule was drawn up for to validate ERP effective in cyanide spills.

PT. EL conducted mock or simulated drills on 22 Sep 2016 for the established ERP in demonstrating that the established ERP has been implemented. Based on reports reviewed it was ascertained that the ERP had been implemented and ERP effectiveness evaluated and is appropriate.

PT. EL had established procedure to evaluate ERP performance, which is at least once a year after its implementation and made revision to ERP if deemed necessary.

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Date  
1 Dec 2017

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