



May 2013

INTERNATIONAL CYANIDE MANAGEMENT CODE

Transport Terrassement Minier, Republic of Guinea, Transportation Recertification Audit, Summary Audit Report

Submitted to:

International Cyanide Management Institute
(ICMI)
888 16th Street, NW-Suite 303
Washington, DC 20006
UNITED STATES OF AMERICA

Transport Terrassement Minier
BP: 463
Conakry
Republic of Guinea
West Africa

REPORT



Report Number. 137648010-003-R-Rev0

Distribution:

- 1 Copy - ICMI (+1 Electronic)
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APPENDICES

APPENDIX A

Limitations



1.0 INTRODUCTION

1.1 Operational Information

Name of Transportation Facility:	Transport Terrassement Minier
Name of Facility Owner:	Not Applicable
Name of Facility Operator:	Transport Terrassement Minier
Name of Responsible Manager:	Eric Rafin, Director
Address:	Transport Terrassement Minier BP: 463 Conkary Republic of Guinea
State/Province:	Conkary
Country:	Republic of Guinea
Telephone:	+224 63407487
Fax:	N/A
Email:	ericrafin@yahoo.fr

1.2 Description of Operation

1.2.1 Transport Terrassement Minier

Transport Terrassement Minier (TTM) is a Guinean company with its head office located in the Matoto region of Conakry. Further support offices and workshops are spread through Guinea to service the company's three core areas of business:

- Transport - TTM operates specialised transport services, including dangerous goods transportation for the mining and resource industries.
- Terrassement (Earthworks) - TTM operates a fleet of earth moving equipment, which service contracts with the Government for road building and repairs, the mining industry for building haul roads and access roads as well as earthworks at mining operations for tailings dams and heap leach installations.
- Minier (Mining) - TTM services mining contracts for movement of ore from mining operations to the processing plant. This includes the supply of labour, equipment and plant servicing.

TTM was founded in 1997. The company has approximately 350 employees and operates a range of transport, earth moving and mining equipment.

1.2.2 Road Transportation

During the first half of the Recertification period, the cyanide transported by TTM to AngloGold Ashanti's Siguiri Gold Mine in Mali originated from the Australian Gold Reagent (AGR) cyanide production facility at CSBPs Kwinana complex. In late 2011, AngloGold Ashanti's Siguiri Gold Mine changed cyanide suppliers from AGR to TaeKwang Industrial Co Ltd (TaeKwang). Samsung C&T Corporation (Samsung) is engaged by TaeKwang to act as the consignor for the delivery of its cyanide from the Port of Ulsan to destination ports, including the Port of Autonom De Conakry.

Transport Terrassement Minier

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Upon arrival at the Port of Autonom De Conakry, the offloading of all containers is performed by stevedores using the ships cranes. Prior to 1 March 2012, storage in transit did occur at the Port of Autonom De Conakry for four to five days while formalities such as customs clearance and carrier releases are performed. Once formalities were complete, the cyanide containers were collected from the Port and taken to the TTM Transport Yard where they were stored on the truck overnight in preparation for convoy departure the following morning at 0600 hrs. At no stage was cyanide removed from the trucks or containers prior to unloading at customer mine sites.

Since 1 March 2012, the Conakry Terminal Stevedore advised TTM of a change in ship unloading procedures, which required Class 6.1 Dangerous goods to be loaded directly from the ship onto the truck rather than placed and stored at the Port. In the event that a truck was not present, the container would not be unloaded. The change was due to a change in management at the Port of Conakry. Once the cyanide containers are collected from the Port, they are taken to the TTM Transport Yard where they are stored on the truck overnight in preparation for convoy departure the following morning at 0600 hrs. At no stage is cyanide removed from the trucks or containers prior to unloading at AngloGold Ashanti's Siguiri mine site, which is approximately 815 km away.

1.3 Transit Storage

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. Following collection from the Port, containers are temporarily stored on the trailer at the TTM depot overnight in preparation for departure to the customer mine sites the following morning. At no stage is cyanide removed from the trucks or containers prior to unloading at customer mine sites.

Transport Terrassement Minier

Name of Facility

Signature of Lead Auditor

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Date



1.4 Auditors Findings and Attestation

Transport Terrassement Minier is: in full compliance with **The International Cyanide Management Code**

in substantial compliance with

not in compliance with

Audit Company: Golder Associates

Audit Team Leader: Edward Clerk, CEnvP (112), RABQSA (020778)

Email: eclerk@golder.com.au

1.5 Name and Signatures of Other Auditors

Name	Position	Signature	Date
Edward Clerk	Lead Auditor and Technical Specialist		31 May 2013

No significant cyanide exposures and releases were noted as occurring during the audit period. One incident (not involving a release or exposure) occurred during the recertification period.

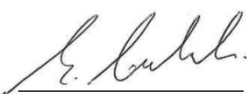
1.6 Dates of Audit

The Recertification Transport Audit of TTM was undertaken over three days between 26 and 28 February 2013.

An extension of the submittal deadline for the audit reports was granted by the International Cyanide Management Institute to 19 June 2013.

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.

Transport Terrassement Minier  31 May 2013

Name of Facility Signature of Lead Auditor Date



2.0 TRANSPORTER SUMMARY

2.1 Principle 1 – Transport

Transport Cyanide in a manner that minimises the potential for accidents and releases.

2.1.1 Transport Practice 1.1

Purchase cyanide from manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

TTM is in FULL COMPLIANCE with Transport Practice 1.1 requiring cyanide transport routes to be selected to minimise the potential for accidents and releases.

TTM has developed a procedure to guide the selection of transport routes to minimise the potential for accidents and releases or the potential impacts of accidents and releases. TTM, in consultation with its cyanide supplier/consignor and mining company customer, has implemented the procedure and conducted route surveys for the selected route. A risk assessment is conducted on hazards identified during the route survey. The results of the risk assessment are used to control measures.

TTM update its route selection procedure and associated outputs every two years. In addition, verbal debriefing sessions are held with the mine site at the end of each delivery and upon return to the TTM depot.

There is only a single route available for the delivery of cyanide from the Port of Autonom De Conakry to AngloGold Ashanti’s Siguiri mine which is located 815 km to the east-north-east of Conakry. The route selected corresponds to the Trans ECOWAS (Economic Community of West Africa States) route or the main commercial route linking Guinea, Mali, Burkina Faso, Ghana and the Ivory Coast.

The Ministry of the Interior have also issued TTM with a decree specifying that cyanide is transported along the ECOWAS route.

TTM has implemented a procedure requiring annual route surveys and has a process of obtaining feedback on route conditions after each convoy.

TTM has documented measures taken to address risks identified with the selected routes within a Transport Management Plan (TMP).

TTM has consulted as necessary with stakeholders and applicable governmental agencies in the selection of routes and development of cyanide management measures.

Convoys are used as a means of managing the risks of the road conditions and responding to emergencies. Security is managed through the use of government escorts.

TTM, in conjunction with AGR and AngloGold Ashanti Siguiri Gold Mine has advised external responders and medical facilities as necessary of their roles during an emergency response.

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In the event of an incident, primary emergency response is coordinated by the TTM Escort Chief using TTM personnel present within the convoy. Secondary response activities are conducted by TTM personnel and supported by the supplier/consignor and AngloGold Ashanti Siguiri Gold Mine.

TTM do not subcontract cyanide handling or transport activities.

Transport Terrassement Minier

Name of Facility

A handwritten signature in black ink, appearing to read "E. L. L. L.", positioned above a horizontal line.

Signature of Lead Auditor

31 May 2013

Date



2.1.2 Transport Practice 1.2

Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

The operation is **in full compliance with** **Transport Practice 1.2**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

TTM is in FULL COMPLIANCE with Standard of Practice 1.2 requiring that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

TTM uses dedicated drivers that have appropriate training and vehicle licences to transport cyanide. Mali, Burkina Faso and Guinea are all members of ECOWAS and drivers' licences issued in Guinea are valid in other ECOWAS member countries.

Guinea does not have any dangerous goods legislation, despite this, dangerous goods training of all cyanide drivers is provided by TTM.

All 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. This includes defensive driver, cyanide awareness, first aid, fire fighting and emergency response training.

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2.1.3 Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

The operation is **in full compliance with** **Transport Practice 1.3**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

TTM is in FULL COMPLIANCE with Standard of Practice 1.3 requiring that transport equipment is suitable for cyanide shipment.

TTM only uses equipment designed and maintained to operate within the cyanide loads it will be handling. The Company has identified ten Renault and Volvo trucks (dedicated) and 12 trailers (multiuse) for the transport of cyanide. The trucks were purchased to a design specification. The design specification is appropriate for the cyanide transport task and the loads are well within the ECOWAS limit for public roads (11.5 tonnes per axle).

No other load bearing equipment is used by TTM.

TTM has a preventative maintenance programme in place that conforms to Renault's and Volvo's recommendation. Outside of the preventative maintenance programme, records indicate drivers actively report defects and that those defects are rectified.

TTM maintains records of vehicle and trailer specifications and maintenance history.

The container weights are detailed on the Bill of Lading prior to container collection from the Port of Autonom De Conakry. These are checked to ensure that the transport equipment allocated is suitable and not overloaded. The design of the trucks and trailers is such that they cannot be overloaded.

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2.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

TTM has procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging. The Bill of Lading is stamped by the Port Authority indicating the containers have been delivered undamaged with the seals intact. The document is also stamped by the Mine Site Transit Officer upon arrival at the mine site. The stamp indicates that the containers have been delivered undamaged with the seals intact.

TTM transport cyanide for Code certified cyanide producers and consignors, who have systems in place to ensure their containers are labelled in accordance with the International Maritime Organisation Dangerous Goods (IMDG) Code and as required by local regulations or international standards. Placarding is not required under existing Guinea or ECOWAS legislation. As a control measure, the cyanide is trucked in convoy under the escort of persons who have received training in cyanide emergency response and dangerous goods training.

TTM has implemented a safety programme for cyanide transport that includes:

- Vehicle inspections, including checks for signs of stress or overloading such as cracking.
- Preventative maintenance programmes in line with manufacturer recommendations.
- Limitations on operator or drivers' hours.
- Procedures to prevent loads from shifting, including the use of twist locks on the containers.
- Procedures to modify or suspend transport if conditions such as severe weather or civil unrest are encountered.
- A drug, tobacco and alcohol abuse policy.
- Retention of records.

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2.1.5 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

Summarise the basis for this Finding/Deficiencies Identified:

Standard of Practice 1.5 requiring the operation to follow international standards for transportation of cyanide by sea and air is NOT APPLICABLE to TTM.

TTM does not transport consignments of cyanide by sea within the scope of this audit.

Consignments of cyanide transported by TTM have arrived in Guinea via the Port of Autonom De Conakry from AGR and Samsung, who are Code certified consignors. The cyanide is produced by AGR and TaeKwang, both of which produce cyanide in Code certified production facilities. As a Code certified cyanide producer and or Transport, AGR, TaeKwang and Samsung have systems in place to ensure their containers are labelled in accordance with the IMDG Code and as required by local regulations or international standards.

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2.1.6 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

Summarise the basis for this Finding/Deficiencies Identified:

TTM is in FULL COMPLIANCE with Standard of Practice 1.6 requiring the operation track cyanide shipments to prevent losses during transport.

TTM vehicles use cell phones to communicate directly with the TTM Transport Office, the mining operation, emergency responders, and indirectly with the cyanide producer. Waybill documentation, including information on the convoys, is emailed to the consignor and mining operation prior to departure.

Communication equipment (global positioning system (GPS), mobile phone, radio, pager, etc.) is periodically tested to ensure it functions properly. The TTM Sodium Cyanide Convoy Vehicle Checklist requires the Convoy Manager to have two phones containing a total of four sim cards providing route coverage.

The GPS tracking system is checked though continuous use

The Operations Manager confirmed that the entire route has cell phone coverage from one of four cell phone providers, but no individual cell phone provider has 100% coverage of the route. TTM escort personnel carry two phones with four Sim cards in the front and rear escort vehicles to ensure communication coverage across the entire route. The TTM drivers also carry individual phones serviced by Orange, which has the most coverage across the route. Inter convoy communication is conducted by cell phone between the front and rear escort vehicles and intermittently with the trucks when compatible signals allow. The drivers advised that if they are experiencing a problem they typically communicate using lights or horns. The closed nature of the convoy allows trucks experiencing troubles to be detected by at least one escort vehicle and this vehicle communicates with the other. In the event of a problem with one truck, the entire convoy stops.

TTM uses a combination of phone calls, GPS and the provision of Waybill information to track the progress of cyanide shipments.

TTM implement chain of custody procedures to prevent loss of cyanide during shipment. The cyanide supplier/consignor advises TTM and the customer mine site via email, shipping departure dates and attaches the packing list and Ship of Lading documentation. Both documents note the container numbers and seal numbers.

The Bill of Lading is stamped by the Port Authority indicating the containers have been delivered undamaged with the seals intact. The document is also stamped by the Mine Site Transit Officer upon arrival at the mine site. The stamp indicates that the containers have been delivered undamaged with the seals intact.

Shipping records indicating the amount of cyanide in transit and Material Safety Data Sheets are available during transport.

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2.2 Principle 2 – Interim Storage

Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures.

2.2.1 Transport Practice 2.1

Store cyanide in a manner that minimises the potential for accidental releases.

in full compliance with

The operation is in substantial compliance with **Transport Practice 2.1**

not in compliance with

not applicable

Summarise the basis for this Finding/Deficiencies Identified:

Standard of Practice 2.1 requiring transporters design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures is NOT APPLICABLE to TTM.

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. Prior to 1 March 2012, storage in transit did occur at the Port of Autonom De Conakry for four to five days while formalities such as customs clearance and carrier releases were performed. Once formalities were complete, the cyanide containers were collected from the Port and taken to the TTM Transport Yard, where they were stored on the truck overnight in preparation for convoy departure the following morning at 0600 hrs. At no stage was cyanide removed from the trucks or containers prior to unloading at customer mine sites.

Since 1 March 2012, the Conakry Terminal Stevedore advised TTM of a change in ship unloading procedures, which requires Class 6.1 Dangerous goods to be loaded directly from the ship onto the truck rather than placed and stored at the port. In the event that a truck was not present, the container would not be unloaded. The change was due to a change in management at the Port of Conakry. Once the cyanide containers are collected from the Port, they are taken to the TTM Transport Yard where they are stored on the truck overnight in preparation for convoy departure the following morning at 0600 hrs. At no stage is cyanide removed from the trucks or containers prior to unloading at customer mine sites.

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2.3 Principle 3 – Emergency Response

Protect communities and the environment through the development of emergency response strategies and capabilities.

2.3.1 Transport Practice 3.1

Prepare detailed Emergency Response Plans for potential cyanide releases.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

TTM is in FULL COMPLIANCE with Standard of Practice 3.1 requiring the operation prepare detailed Emergency Response Plans (ERP) for potential cyanide releases.

TTM has developed detailed documents to cover emergency response for potential cyanide releases for cyanide transportation within Guinea, Burkina Faso and Mali. The information is contained within an ERP and route specific TMP.

The TMP and ERP are based on road transportation between the Port of Autonom De Conakry and a customer mine site in Mali. The plans are appropriate for the selected transportation routes and they consider relevant aspects of the transport infrastructure. The route evaluation process, route hazard/risk assessment process, and operational experience were used by TTM and AGR to identify three likely emergency scenarios:

- Transport incident – Vehicle Rollover caused by pulling over to stop on soft edge along a sealed road. Sea container intact with no spill or product release.
■ Transport incident – Vehicle Rollover caused by crash or crash avoidance with another vehicle. Sea container intact with no spill or product release.
■ Transport incident – Vehicle Rollover caused by crash or crash avoidance with another vehicle. Sea container damaged resulting in spill of product released from container.
■ Unplanned Delivery – Unplanned or emergency delivery of from cyanide producer.

The plans consider the physical and chemical form of cyanide and design of the transport vehicle. The emergency response guides developed are relevant to solid cyanide and its packaging in IBCs within 20 foot sea containers. Storage facility emergency response plans were not developed, as cyanide is not stored at an interim storage facility between the Port and the mine site destination.

The TMP and ERP consider the design of the transport vehicles as it is specifically drafted around the transport of solid cyanide on semi-trailers. The plan specifically states that minimum requirements when transporting single containers are single drive axle trucks and dual-axle trailers.

The TMP and ERP include descriptions of response actions, as appropriate for the anticipated emergency situation.

External responders identified in the documents are aware of their role in an emergency.

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Signature of Lead Auditor

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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

The operation is

in substantial compliance with

Transport Practice 3.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

TTM is in FULL COMPLIANCE with Standard of Practice 3.2 requiring they designate appropriate response personnel and commit necessary resources for emergency response.

TTM provides emergency response training for all convoy personnel, including police and customs officers involved in the convoy. TTM has developed a training matrix for all transport personnel. This matrix identifies the needs of training for escort personnel and convoy drivers. All 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 of cyanide handling and transport equipment operators is coordinated by TTM.

There are descriptions of the roles and responsibilities during and emergency in the TMP, ERP, Emergency Response Training Package and Cyanide Awareness Training.

Each TTM convoy carries their own emergency response equipment. TTM has a checklist for necessary emergency response and health and safety equipment, including personal protective equipment that is checked before each convoy.

TTM provides initial and periodic training for all their convoy personnel. The TTM training matrix includes all the training required for Escort personnel and Divers. This includes initial and annual training.

TTM does not subcontract any of the cyanide handling, transport or emergency response activities.

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2.3.3 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

Summarise the basis for this Finding/Deficiencies Identified:

TTM is in FULL COMPLIANCE with Standard of Practice 3.3 requiring that they develop procedures for internal and external emergency notification and reporting.

The ERP contains procedures and current contact information for notifying the shipper, the receiver/consignee, outside response providers, and medical facilities of an emergency. In addition, relevant contact numbers are stored in the mobile phones carried by the convoy.

TTM has systems in place to ensure that internal and external emergency notification and reporting procedures are kept current. TTM has a procedure that requires it to update and assess the ERP and TMP annually. These documents contain emergency response numbers and reporting procedures.

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2.3.4 Transport Practice 3.4

Develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

TTM is in FULL COMPLIANCE with Standard of Practice 3.4 requiring that they develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

TTM has procedures for remediation, such as recovery or neutralisation of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris. Part B (Clean-up and Containment) of the Transport Management Plan contains relevant information on:

- Handling Hazards and Precautions
- Containment
- Recovery and Treatment of Spills
- Water Resource Treatment
- Neutralisation
- Reporting and Investigation.

Remediation and neutralisation processes are also detailed in the emergency response section of the cyanide awareness training programme.

Section 7 of the TMP contains a statement prohibiting the use of ferrous sulphate to treat cyanide that has been released into surface waters.

The emergency response section of the cyanide awareness training programme provided to all TTM Drivers and Escort team personnel details that chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide should not be released into surface water.

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2.3.5 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

Summarise the basis for this Finding/Deficiencies Identified:

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

TTM has provisions for periodically reviewing and evaluating the adequacy of their plans. TTM has a procedure that requires it to update and assess the ERP and TMP annually. A discussion with the Operations Manager and the revision numbering on the documentation confirmed that this procedure is being implemented.

TTM completes annual mock drills as part of the practical section of the cyanide awareness training. All convoy personnel, including police and customs officers participate in this training.

The ERP contains provisions for conducting a review after an incident. One incident (not involving a release or exposure) occurred during the recertification period. The Auditor was able to confirm that the ERP and relevant documentation was updated following the results of an investigation into the causes of the incident.

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3.0 LIMITATIONS

Your attention is drawn to the document - "Limitations", which is included as Appendix A to this report. This document is intended to assist you in ensuring that your expectations of this report are realistic, and that you understand the inherent limitations of a report of this nature. If you are uncertain as to whether this report is appropriate for any particular purpose please discuss this issue with us.

Transport Terrassement Minier

Name of Facility

Signature of Lead Auditor

31 May 2013

Date



Report Signature Page

GOLDER ASSOCIATES PTY LTD

A handwritten signature in black ink, appearing to read 'E. Clerk', positioned below the company name.

Ed Clerk
ICMI Lead Auditor and Technical Specialist

EWC/RJB/eh

A.B.N. 64 006 107 857

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APPENDIX A

Limitations



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