

September 2008

INTERNATIONAL CYANIDE MANAGEMENT CODE PRE-OPERATIONAL AUDIT

Dundee Precious Metals Inc.
Chelopech Copper Gold Expansion
Project, Bulgaria
Pre-Operational Audit
Summary Audit Report

Submitted to:

International Cyanide Management Institute (ICMI) 1200 G Street, NW, Suite 800 Washington, DC 20005 UNITED STATES OF AMERICA Dundee Precious (Chelopech) BV. C/- Dundee Precious Metals Inc. Level 26 St Martins Tower 44 St Georges Terrace PERTH WA 6000

REPORT

Report Number: 087641074 003 R Rev0

1 Copy - International Cyanide Management Institute

1 Copy – Dundee Precious (Chelopech) BV.

1 Copy – Golder Associates







Record of Issue

Company	Client Contact	Version	Date Issued	Method of Delivery
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SUMMARY AUDIT REPORT FOR PREOPERATIONAL GOLD MINES

Name of Mine: Chelopech Copper Gold Expansion Project.

Name of Mine Owner: Dundee Precious Metals Inc.

Name of Mine Operator: Dundee Precious (Chelopech) BV.

Name of Responsible Manager: Ian Ritchie, Project Manager Chelopech Expansion Project

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LOCATION DETAIL AND DESCRIPTION OF OPERATION:

The Chelopech Project is managed by Dundee Precious (Chelopech) BV., a subsidiary of Dundee. The Chelopech Project is an operating gold-copper mine situated west of the village of Chelopech at the foothills of the Balkan Mountains at about 740 m above sea level. Historical records indicate that mining in the area began in the 1930s. In 1953, the copper gold reserves were proved with exploration shafts and boreholes and the resource estimation was completed in 1956. The mine was commissioned in the same year.

The high arsenic content of the ore mined and the concentrate produced requires the operation to export the concentrate abroad for treatment at number of smelters, which results in high cost penalties imposed by the smelters, increased production expenses (including transport charges, unloading charges, customs duties, etc), and generally, reduction of the profitability of the mining operation.

The current operation does not use cyanide but the Chelopech Copper Gold Expansion Project (CEP) will employ cyanide for the recovery of gold. .

The CEP is an initiative by Dundee to increase project profitability by refining the concentrate on-site using pressure oxidation (POX/CIL) and solvent extraction / electrowinning (SX/EW) for copper, and cyanidation of the residue for gold. The tailings produced from the POX/CIL process has been designated for storage in a dedicated tailings management facility lined with a geosynthetic liner (geomembrane) installed within the basin area. A Caro's acid generator will be used to facilitate cyanide destruction which will result in a maximum WAD cyanide level of <10 mg/L being discharged at the POX/CIL TMF spigot.

The current operation treats ore produced from an underground mining operation at a throughput of one million tonnes per annum (Mtpa) (raised from 0.7 Mtpa in October 2005). The operation plans to increase this to a minimum of two million tonnes per annum. Following the commissioning of the plant, together with suitable exploration success it is proposed to expand the operation further to three million tonnes per annum capacity.

Dundee commissioned the Balkan Centre for Science and Education on Ecology and Environmental Protection (BCSEEEP) assisted by Scott Wilson Mining to carry out an Environmental Impact Assessment (EIA) of the proposed expansion in April 2004.





The main project elements comprise of:

- Expanding the mine throughput up to three million tonnes per annum.
- Upgrading the capacity of the mill to process up to three million tonnes per annum of ore to produce approximately 150,000 tonnes per annum (tpa) of copper-gold concentrate.
- Commissioning of a downstream concentrate processing plant for the production of metals on site.
- Upgrading and stabilising the existing Tailings Management Facility (TMF) to store the waste from the ore processing.
- Commissioning of a new TMF to store the waste from the concentrate processing to the production metals on site.

The reference to "Dundee" within this report refers to the operational entity of Chelopech Mining EAD and any subsidiaries including Dundee Precious (Chelopech) BV.





SUMMARY AUDIT REPORT AUDITORS FINDINGS

The Chelopech Copper Gold Expansion Project is:

☑ in full compliance with	
	The International
in substantial compliance with	Cyanide Management
□ not in compliance with	Code
not in compliance with	

Audit Company:

Golder Associates

Audit Team Leader:

Edward Clerk, CEnvP (112), RABQSA (020778)

Email:

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Name and Signatures of Other Auditors:

Name	Position	Signature	Date
Edward Clerk	Lead Auditor and Technical Specialist	l. bhl	1 September 2008
Mark Latham	Auditor	Marka	1 September 2008

Dates of Audit:

The Pre-Operational Certification Audit was undertaken over three days (six person days) between 11 and 13 August 2008.

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's *Gold Mining Operations Verification Protocol* and using standard and accepted practices for health, safety and environmental audits.

Chelopech Expansion Project

Name of Facility

Signature of Lead Auditor

16 Emerald Terrace

West Perth Western Australia General Public Notary





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Limitations





PRINCIPLE 1 - PRODUCTION:

Encourage Responsible Cyanide Manufacturing by Purchasing from Manufacturers that Operate in a Safe and Environmentally Protective Manner

Standard of Practice 1.1:	Purchase cyanide from manufacture and procedures to limit exposure of prevent releases of cyanide to the er	their workforce to cyanide, and to
	⊠ in full compliance with	
The operation is	☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 1.1

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 1.1, requiring the operation 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.

CEP has developed a cyanide Management Plan (CMP). Section 7.1 (Production) of the Cyanide Management Plan (CMP) notes that whilst cyanide supply contracts are not as yet formalised, Dundee commit to signing of contract(s) with cyanide manufacturers requiring either that the cyanide to be produced at the facility that has been certified as being in compliance with the Code, or the manufacturer(s) provide the results of an independent third party audit of the cyanide production facilities.

The CMP requires chain of custody documentation for each batch of cyanide acquired for the CEP and the CMP also limits potential cyanide manufactures to those certified on the ICMI website or having to having completed an audit before commencing commercial negotiations

All commitments made in the CMP have been approved by:

- General Manager, Chelopech Mining EAD, and
- Vice President Environment and Sustainable Development, Dundee Precious Metals.

Signature of Lead Auditor

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PRINCIPLE 2 – TRANSPORTATION:

Protect Communities and the Environment During Cyanide Transport

Standard of Practice 2.1:	Establish clear lines of responsibil prevention, training and emergency with producers, distributors and tra	y response in written agreements
	oxtimes in full compliance with	
The operation is	in substantial compliance with	Standard of Practice 2.1
	not in compliance with	
Summarise the basis for th	is Finding/Deficiencies Identified:	

The operation is in FULL COMPLIANCE with Standard of Practice 2.1, requiring that the operation establish clear lines of responsibility for safety, security, release prevention, training and emergency response in written agreements with producers, distributors and transporters.

CEP has committed to enter into written agreements between the operation, the cyanide producer, distributor, and transporters designating responsibility for the items listed under this Standard of Practice. This commitment also extends to subcontractors used by the producer, distributor, transporter or the operation for transportation-related activities

The commitments are detailed the Section 7.2 (Transportation) of the CMP.

Standard of Practice 2.2:	Require that cyanide transporters implement appropriate emergency response plans and capabilities and employ adequate measures for cyanide management.	
	$oxed{\boxtimes}$ in full compliance with	
The operation is	in substantial compliance with	Standard of Practice 2.2
	not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 2.2, requiring the operation ensure that cyanide transporters implement appropriate emergency response plans and capabilities and employ adequate measures for cyanide management

CEP has committed to require by contract that cyanide be transported to its site by transporter(s) that either a) are certified as being in compliance with the Code or b) that provide the results of an audit of their cyanide transport activities. The audits are to be conducted at least every three years by an independent third party meeting the qualifications established by ICMI.

CEP has also committed in Section 7.2 (Transportation) of the CMP that contracts shall ensure transporters:

- consider using a GPS tracking system on route;
- accept to be audited by CEP up to twice a year without prior notice; and
- notify Dundee of any changes to the transport supply arrangements.

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PRINCIPLE 3 – HANDLING AND STORAGE

Design and Construct Unloading, Storage and Mixing Facilities Consistent with Sound, Accepted Engineering Practices, Quality Control/Quality Assurance Procedures, Spill Prevention and Spill Containment Measures

Standard of Practice 3.1:	Design and construct unloading, storage and mixing facilities consistent with sound, accepted engineering practices, quality control/quality assurance procedures, spill prevention and spill containment measures.	
	oxtimes in full compliance with	
The operation is	in substantial compliance with	Standard of Practice 3.1
	not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Handling and Storage Practice 3.1, requiring that cyanide handling and storage facilities are designed and constructed consistent with sound, accepted engineering practices, quality assurance/quality control (QA/QC) procedures, spill prevention and spill containment measures.

The operation has engaged a reputable engineering firm, GRD Minproc, to engineer cyanide handling and storage facilities according to recognised standards, including those required to satisfy the SEVESO II Directive as administered in Bulgaria. The cyanide handling and storage facilities will be located 430 m from Chelopech Village and 630 m from Kachulka Reservoir. Cyanide will be delivered to the operation in solid form and so there will be no requirement to unload liquid cyanide on concrete or to contain and recover spills. Level instrumentation will be provided on the mixing and storage tanks to prevent overfilling. The integrated mixing and storage tank will be located on a concrete plinth in an area surfaced with concrete surfaced and bunded with concrete. These facilities are located within a ventilated and water-proofed room secured from unauthorised access. The sulphuric and nitric acids and hydrogen peroxide to be used at the facility will be located separate from the reagent cyanide handling area.

Design drawings demonstrate that spill prevention or containment measures will be provided for the cyanide storage/mixing tank. The CMP documentations the operation's commitment that secondary containments for cyanide unloading, storage, mixing and process tanks will be sized to hold a volume greater than that of the largest tank within the containment together with the volume that may drain back to the tank from piping and any precipitation that may accumulate during a design storm event. Cyanide process solution pipelines are located so that any leaks will accumulate directly or be directed by a pipe sleeve to the secondary containment areas. The CMP and design specifications demonstrate that the operation has committed that cyanide tanks and pipelines will be constructed of materials compatible with cyanide and high pH conditions.

The operation has committed to implement quality control and quality assurance programs during construction of the cyanide unloading, storage and mixing facilities. The quality program records generated during construction of those facilities will be retained to demonstrate that appropriately qualified personnel will have reviewed cyanide facility construction to confirm that the facilities were constructed as proposed and approved.

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Standard of Practice 3.2: Operate unloading, storage and mixi preventive maintenance and conting releases and control and respond to		ency plans to prevent or contain
	⊠ in full compliance with	
The operation is	☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 3.2

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Handling and Storage Practice 3.2 requiring that cyanide handling and storage facilities are operated using inspections, preventive maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.

Dundee has committed that the timber from cyanide IBCs will be returned to the cyanide supplier for reuse and that the plastic packaging materials will be rinsed with water three times pending destruction by incineration in the tailings management facility. Procedures dealing with the return of packaging materials will be detailed based on the findings of a risk assessment. Valve operations for the mixing of cyanide will be programmed in a logic controller. Manual operations will be required to be in accordance with procedures committed to be developed to address the handling of containers to avoid rupturing and puncturing, storage of containers stacked in accordance with suppliers' recommendations, the use of personal protective equipment during mixing, the means of independent observation during mixing and the timely cleanup of any spills that may occur during mixing.

The operation has committed to prepare written management and operating plans or procedures for cyanide facilities to comply with the "SEVESO II" Directive. Dundee has undertaken to include in its procedures the practices identified in the Environmental Impact Assessment, the HAZID, HAZOP and Process Control Philosophy as necessary to protect human health and the environment. Dundee has committed to develop a Code-compliant program of inspections and preventive maintenance through necessary procedures and forms that will guide the recording of details of those inspections and corrective actions.

Automatically controlled pumps are planned to be installed in each secondary containment to support environmentally responsible management of any cyanide solution or cyanide-contaminated water that may collect in those areas.

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PRINCIPLE 4 – OPERATIONS

Manage Cyanide Process Solutions and Waste Streams to Protect Human Health and the Environment

Standard of Practice 4.1:	Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventive maintenance procedures.	
	$oxed{\boxtimes}$ in full compliance with	
The operation is	in substantial compliance with	Standard of Practice 4.1
	not in compliance with	
Summarise the basis for this	Finding/Deficiencies Identified:	
implement management and or	PLIANCE with Standard of Practice 4.1, reperating systems designed to protect humand inspection and preventive maintenan	an health and the environment
facilities to comply with the "SE already been prepared recordir containing residues and key as Environmental Impact Assessmundertaken to include in its proprotect human health and the erequired to comply with the "SI Assessment, the HAZID, HAZO foreseeable abnormal operating effectively. Dundee has commmaintenance through necessar inspections and corrective actions.	o prepare written management and operatives of project devices of the design of the tailings management of sumptions, parameters and regulatory requent, the HAZID, HAZOP and Process Concedures the practices identified in those previous or the practices identified in those previous or the process Control Philosophy have on the process Control Philosophy have on the procedures and the arrangements require itted to develop a Code-compliant program by procedures and forms that will guide the process. An emergency power philosophy and pritional releases and exposures should points.	elopment, documentation has facility planned for cyanide- quirements are set out in the entrol Philosophy. Dundee has roject documents as necessary to enangement of change will be sen for the Environmental Impact generated information on d to manage the associated risks of inspections and preventive execording of details of those I procedure has been drafted to
Standard of Practice 4.2:	Introduce management and operating use, thereby limiting concentrations o	
	$oxed{\boxtimes}$ in full compliance with	
The operation is	in substantial compliance with	Standard of Practice 4.2
	not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 4.2, requiring that the operation limit the use of cyanide to that optimal for economic recovery of gold so that the waste tailings material has as low a cyanide concentration as practical.

The operation has nominated the cyanide addition rate in the mill that are based on detailed test work during the feasibility study stage of the project development. Dundee has assessed that due to the nature of the Chelopech orebodies, the mining method planned and the nature of the treatment processes upstream of the

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CIL circuit, it is unlikely that there will be sudden changes in the nature of the CIL feed material other than those caused by operational issues and considers that periodic monitoring is the appropriate management approach. Routine testwork will be carried out on a weekly composite sample of CIL feed. Daily testwork will be carried out during commissioning and following any significant changes to upstream processing practices.

Standard of Practice 4.3:	Implement a comprehensive water ma against unintentional releases.	nagement program to protect
	☑ in full compliance with	
The operation is	in substantial compliance with	Standard of Practice 4.3
	not in compliance with	
Summarise the basis for this	Finding/Deficiencies Identified:	
•	PLIANCE with standard of Practice 4.3, re	
Dundee has drafted a compreh facility of the Chelopech Expan	ensive, probabilistic water balance for the sion Project.	POX/CIL tailings management
activities to prevent overtopping the environment. The consulta balance have also been engag	o develop operating procedures that incorp g of ponds, impoundments, and unplanned nts who designed the tailings management ed to develop the procedures. The water onable and appropriate manner.	d cyanide solution discharges into nt facility and drafted the water
	ncludes engineering drawings demonstratuate freeboard above the maximum designate calculations.	
and to compare observations to	o install two weather stations that will mea o design assumptions to prompt revisions is been sourced from meteorological statio	to operating practices as necessary.
Standard of Practice 4.4:	Implement measures to protect birds, adverse effects of cyanide process so	
The operation is	in substantial compliance with	Standard of Practice 4.4
	not in compliance with	
Summarise the basis for this	Finding/Deficiencies Identified:	
The operation is in FULL COM	PLIANCE with Standard of Practice 4.4, re	equiring the operation implement

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measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions. CEP does not expect to have any open waters where WAD cyanide exceeds 50 mg/L and a heap leach process is not included as part of the expansion project. A Caro's acid generator will be used to facilitate



cyanide destruction which will result in a maximum WAD cyanide level of <10 mg/L being discharged at the POX/CIL TMF spigot.

Standard of Practice 4.5: discharges of cyanide proce	Implement measures to protect fish a ss solutions to surface water.	nd wildlife from direct or indirect
	oxtimes in full compliance with	
The operation is	in substantial compliance with	Standard of Practice 4.5
	not in compliance with	
Summarise the basis for this	Finding/Deficiencies Identified:	
	PLIANCE with Standard of Practice 4.5, reildlife from direct or indirect discharges of	
provided in a permit for Use of cyanide. The CEP implements	rges waste water in compliance with individual a Water Resource – Surface Water. The ation will require that the waste water discharge to surface water with the potential to	waste water does not contain arge permit be modified however
indirect discharge to surface w	ion noting that its facilities will be designed ater. Tailings consultant, Knight Piésold, h under a conservative "worst case" set of a 0.0003 ppm WAD CN.	nas completed a detailed seepage
Groundwater and seepage wat	ter under the TMF lining will be fed to a co	llector and returned to the TMF.
The European Union Extractive mixing zones.	e Industries Waste Directive does not allow	v for the establishment of regulatory
Standard of Practice 4.6:	Implement measures designed to mar facilities to protect the beneficial uses	
	⊠ in full compliance with	
The operation is	in substantial compliance with	Standard of Practice 4.6
	not in compliance with	
	not subject to	
Summarise the basis for this	Finding/Deficiencies Identified:	
The operation is in FULL COM	PLIANCE with Standard of Practice 4.6. re	equiring the operation implement

measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater.

The operation has noted limited beneficial use of groundwater up-gradient from the proposed CEP. Dundee is not aware of groundwater users either near or downstream of the proposed CEP. The design of the CIL TMF enables Dundee to commit to management of seepage from the CIL TMF to protect the beneficial use(s) of ground water beneath and/or immediately down gradient of the facility.

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CEP has presented design and proposed operating information regarding specific water management techniques to manage seepage to protect the beneficial use(s) of groundwater beneath and/or immediately downgradient of the operation. Major components of the seepage control system for the POX/CIL TMF are:

- a low permeability HDPE liner;
- an underdrainage collection system and toe drain;
- a leachate collection and recovery system;
- a decant and supernatant water return system; and
- an emergency spillway reporting to the downstream Flotation TMF.

There are no users of groundwater downstream of the operation and there is no zoning or planning instrument in place requiring the groundwater to meet any other use criteria.

A regulation within the Water Act which requires monitoring to be carried out and compliance of the groundwater chemistry with a standard established in the regulation. The location of the new piezometers has been specified and agreed in the environmental approval and relevant IPPC.

Tailings containing cyanide will not be used as backfill; all tailings containing cyanide will be deposited in the POXCIL TMF.

Standard of Practice 4.7:	Provide spill prevention or containment measures for process tanks and pipelines.	
	oxtimes in full compliance with	
The operation is	in substantial compliance with	Standard of Practice 4.7
	not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 4.7 requiring spill prevention or containment measures for process tanks and pipelines.

Design drawings demonstrate that spill prevention or containment measures will be provided for all cyanide unloading, storage, mixing and process solution tanks. This includes provision of a system to detect leaks from beneath tanks installed on ring beams; the cyanide mixing/storage tank is the only tank planned to handle >0.5 mg/L WAD cyanide that will be installed on a sold concrete plinth. The CMP documentations the operation's commitment that secondary containments for cyanide unloading, storage, mixing and process tanks will be sized to hold a volume greater than that of the largest tank within the containment together with the volume that may drain back to the tank from piping and any precipitation that may accumulate during a design storm event. Automatically controlled pumps are planned to be installed in each secondary containment to support environmentally responsible management of any cyanide solution or cyanide-contaminated water that may collect in those areas. Cyanide process solution pipelines are located so that any leaks will accumulate directly or be directed by a pipe sleeve to the secondary containment areas. The tailings lines will be constructed to high standards and will be routed under removable covers through concrete-lined channels (or with equivalent protection and road and stream crossings). The CMP and design specifications demonstrate that the operation has committed that cyanide tanks and pipelines will be constructed of materials compatible with cyanide and high pH conditions.

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Standard of Practice 4.8:	Implement quality control/quality assu cyanide facilities are constructed accostandards and specifications.	
The operation is	in substantial compliance with	Standard of Practice 4.8
	not in compliance with	
Summarise the basis for this	Finding/Deficiencies Identified:	
	PLIANCE with Standard of Practice 4.8 receipt procedures to confirm that cyanide facilities and specifications.	
	ent quality control and quality assurance pr cyanide unloading, storage, mixing facilitie	
The quality control and quality assurance records generated during construction of the cyanide facilities will be retained to demonstrate that appropriately qualified personnel will have reviewed cyanide facility construction to confirm that the facilities were constructed as proposed and approved. The operation has also committed to have independent experts inspect TMFs annually.		
Standard of Practice 4.9:	Implement monitoring programs to eva on wildlife, surface and groundwater q	
	$oxed{oxed}$ in full compliance with	
The operation is	in substantial compliance with	Standard of Practice 4.9
	not in compliance with	
Summarise the basis for this	Finding/Deficiencies Identified:	
•	PLIANCE with Standard of Practice 4.9 rec e the effects of cyanide use on wildlife, sur	
compliance with the documente was prepared in 2001 and revis	ee Precious (Chelopech) BV. performs envel Environmental Monitoring Programme (led in October 2005 by the Dundee Preciotions confirmed the person is appropriately	EMP) prepared in 2001. The EMP us (Chelopech) BV. Environmental
	illings Management Facilities Final Design The Knight Piésold Flotation Tailings Mar opropriately qualified person.	
The CMP contains commitment the CMP provides detail commi	s relating to monitoring CEP's cyanide facting the operation to:	ilities. Section 7.4 (Operations) of
have its sampling and ana	lytical protocols developed by appropriate	ly qualified personnel.
	001.1	

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- develop sampling procedures that include how and when samples should be taken, sample preservation techniques, chain of custody procedures, shipping instructions and cyanide species to be analysed.
- prepare a formal sampling manual (as a field report) which documents the sampling conditions (e.g., weather, livestock/wildlife activity, anthropogenic influences, etc.) and associated procedures;
- daily monitoring and analysis (including groundwater) of a cyanide discharge solution in the unlikely event that it occurs; and
- daily documented inspections for wildlife mortality;

CEP does specify the frequencies of monitoring activities and they are considered adequate to characterise the medium being monitored and to identify changes in a timely manner.

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Signature of Lead Auditor

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PRINCIPLE 5 - DECOMMISSIONING

Manage Cyanide Process Solutions and Waste Streams to Protect Human Health and the Environment

Standard of Practice 5.1:	Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock.	
	oxtimes in full compliance with	
The operation is	in substantial compliance with	Standard of Practice 5.1
	not in compliance with	
Summarise the basis for this	Finding/Deficiencies Identified:	
	PLIANCE with Standard of Practice 5.1 rective decommissioning of cyanide facilities	
CEP has several documents de	etailing the conceptual plan to decommissi	on cyanide facilities at the

EIA Statement.

cessation of operations. These are:

- POX/CIL and Flotation Tailings Management Facilities Final Design Report
- Tailings Management Facility Initial Closure Plan (Option for Immediate Closure).
- Integrated Pollution Prevention Control (IPPC) Document.
- CMP

The CMP contains commitments relating to the inclusion of an implementation schedule for detailed operational decommissioning activities in addition to the general provisions within the IPPC document.

CEP through the IPPC Document and the CMP has committed to review its decommissioning procedures for cyanide facilities during the life of the operation and revise them as needed.

Standard of Practice 5.2:	Establish an assurance mechanism capable of fully funding cyanide related decommissioning activities.	
	oxtimes in full compliance with	
The operation is	in substantial compliance with	Standard of Practice 5.2
	not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 5.2 requiring that the operation establish an assurance mechanism capable of fully funding cyanide related decommissioning activities.

Both the IPPC Document and the CMP detail commitments and implementation measures in relation to:

 estimating the cost to fully fund third party implementation of the cyanide-related decommissioning measures

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reviewing and updating the cyanide decommissioning cost estimate at least every five years

A formal Memorandum of Understanding (MOU) between the Bulgarian Government and Dundee was signed in July 2008 to establish the commercial and legal basis for the Expansion Project to proceed. As a part of the MOU CEP is required to provide a financial bond for environmental closure and rehabilitation costs of the existing operations in accordance with best international practices and European Union regulations.

The wording of the MoU does clearly not reflect the mutual understanding that the bond will cover the operation and that the cover required will be recalculated regularly, including at the stage where the project commences operations and the POX TMF is operating. The commitment made by DPM is intended to cover all of our existing and future operations at Chelopech.

The requirement to establish a financial mechanism to cover the estimated costs for cyanide-related decommissioning activities is properly covered by the Concession Contract in particular Article 4 and new Article 19a. It requires financial surety to be in place for the entire operation for the duration of the concession contract.

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PRINCIPLE 6 - WORKER SAFETY

Protect Workers' Health and Safety from Exposure to Cyanide

Standard of Practice 6.1:	Identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them.	
	$oxed{oxed}$ in full compliance with	
The operation is	in substantial compliance with	Standard of Practice 6.1
	not in compliance with	
Summarise the basis for this	Finding/Deficiencies Identified:	
	PLIANCE with Standard of Practice 6.1 rec narios and take measures as necessary to	
conducted to minimise worker of directive to develop a Major Act. The SMS will include an operat related tasks such as unloading decontamination prior to mainted review proposed process and of the such as the s	o developing procedures that describe how exposure through the SEVESO II Directive cident Prevention Policy (MAPP), and a Scional control element that will contain proceduring, mixing, plant operations, entry into configurance should be conducted to minimise vaperational changes and modifications for that the necessary worker protection meas I SMS.	e and the requirement under this afety Management System (SMS). Redures that describe how cyanidened spaces, and equipment worker exposure. Procedures to their potential impacts on worker
In Section 7.6 (Worker Safety) of the CMP (CMP) Dundee commits to the development of formalised procedures in the use of personal protective equipment (PPE) and conducting pre-work inspections, as appropriate and necessary for the operations. This section of the CMP also commits to soliciting and considering worker input in reference to health and safety.		
Standard of Practice 6.2:	Operate and monitor cyanide facilities safety and periodically evaluate the efmeasures.	
	☑ in full compliance with	
The operation is	in substantial compliance with	Standard of Practice 6.2
	not in compliance with	
Summarise the basis for this	Finding/Deficiencies Identified:	
	PLIANCE with Standard of Practice 6.2 rectect worker health and safety and periodic	
CEP has determined an optimu	m condition for extraction of gold in the Cl	L circuit of 10.5.
A design drawing notes the installation of eleven fixed HCN meters around the cyanide storage, cyanide		

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control system alarms when HCN levels exceed 10 ppm.

mixing, CIL, cyanide destruction, goldroom and eluate storage areas. These devices provide local and



HAZOP Studies have identified areas and activities where workers may be exposed to cyanide in excess of concentrations that could cause a fatality.

Section 7.6 (Worker Safety) of the CMP commits to a number of safety measures including:

- The installation and maintenance of ambient or personal monitoring devices.
- The maintenance, testing and calibration of fixed and portable HCN meters as directed by the manufacturer.
- The retention of the detailed calibration records.
- The placement of appropriate cyanide signage.
- The regular inspection and maintenance of safety showers, eye-wash stations and fire extinguishers throughout the facilities.
- Access to Material Safety Data Sheets (MSDS's), first aid procedures and other cyanide safety related information available (English and Bulgarian) and in the areas where cyanide is used.
- The development and implementation of procedures to investigate and evaluate cyanide exposure incidents.

Standard of Practice 6.3:	Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.	
	$oxed{\boxtimes}$ in full compliance with	
The operation is	in substantial compliance with	Standard of Practice 6.3
	not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 6.3 requiring an operation develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

CEP has committed to develop procedures to respond to cyanide exposures. This has been achieved through the SEVESO II Directive. The SEVESO II guidelines describe seven fundamental elements that should be included in the SMS, of which one is planning for emergencies.

Section 7.6 (worker Safety) of the CMP (CMP) has detailed specific commitments that relate to the development and implementation of emergency response plans and procedures to respond to worker exposure to cyanide. The commitments include:

- the development of procedures and systems to have water, oxygen, a resuscitator, antidote kits and communication systems
- regular inspections of first aid equipment to ensure it is available when required, and to store, test and/or replace materials such as cyanide antidotes, including the maintenance of a record of such inspections.
- an on-site capacity to provide first aid or medical assistance to workers exposed to cyanide.

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- A means to transport workers exposed to cyanide to locally available qualified off-site medical facility to the extent required to provide coverage not available from the onsite personnel
- Formalising arrangement with the local hospital, clinic, etc. so that these providers are aware of the potential need to treat patients for cyanide exposure.
- conducting periodic mock emergency drills to test response procedures for various cyanide exposure scenarios with subsequent revision of the emergency response plans should any deficiencies be noted.

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PRINCIPLE 7 - EMERGENCY RESPONSE

Protect Communities and the Environment through the Development of Emergency Response Strategies and Capabilities

		· ·	
Staı	ndard of Practice 7.1:	Prepare detailed emergency response plans for potential cyanide releases.	
		☑ in full compliance with	
The	operation is	in substantial compliance with	Standard of Practice 7.1
		not in compliance with	
Sun	nmarise the basis for this	Finding/Deficiencies Identified:	
	•	PLIANCE with Standard of Practice 7.1 re plans for potential cyanide releases.	quiring an operation prepare
rele	ases of cyanide through the	o develop an Emergency Response Plan to SEVESO II Directive. Under this directive and a SMS have been put into effect to m	e, CEP is required to demonstrate
Sec	tion 7.7 (Emergency Respo	nse) of the CMP details that Dundee is co	ommitted to:
•	and SMS documentation r	rgency Response Plan (ERP) compliant vequirements, as well as the applicable Coll of the scenarios in 7.1.2; and	
•	Including detailed respons to the site within its ERP.	e actions, specifically to address releases	during transport of reagent cyanide
Staı	ndard of Practice 7.2:	Involve site personnel and stakeholde	rs in the planning process.
		$oxed{\boxtimes}$ in full compliance with	
The	operation is	in substantial compliance with	Standard of Practice 7.2
		not in compliance with	
Sun	nmarise the basis for this	Finding/Deficiencies Identified:	
	operation is in FULL COMI connel and stakeholders in t	PLIANCE with Standard of Practice 7.2 re the planning process.	quiring an operation involve site
Sec	tion 7.7 (Emergency Respo	nse) of the CMP (CMP) details commitme	ents that relate to:
•	the involvement of site per necessary resources and	rsonnel and other stakeholders in the deve communication protocols;	elopment of the ERP to confirm the
	<u> </u>	f representatives of the local communities re of the nature of their risks associated w	•

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- ensuring the involvement in the ERP development of outside responders (fire department, Hazmat team, etc), and medical facilities to ensure that these groups can adequately fulfil their designated roles and are familiar with the relevant areas of the site; and
- engaging in continuous consultation or communication with the stakeholders to keep the ERP current by periodic dialogue and in ERP review and amendment where required.

Designate appropriate personnel and commit necessary equipment a resources for emergency response.	
oxtimes in full compliance with	
in substantial compliance with	Standard of Practice 7.3
not in compliance with	
	resources for emergency response. in full compliance with in substantial compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 7.3 requiring an operation designate appropriate personnel and commit necessary equipment and resources for emergency response.

As part of the development and implementation of procedures in, Section 7.7 (Emergency Response) of the CMP, CEP has committed to the development and implementation of procedures to ensure:

- Primary and alternative emergency response co-ordinators who have explicit authority to commit the resources necessary to implement the ERP are designated.
- Emergency Response teams are identified.
- Requirements for training of emergency responders are identified.
- Call-out procedures and 24-hour contact information for the co-ordinators and response team members are identified.
- Allocation of specific duties and responsibilities of the co-ordinators and team members are identified.
- Lists of emergency response equipment, including PPE, available along transportation routes and/or on-site are specified.
- The inspection of emergency response equipment to ensure its availability and fitness for purpose.
- Descriptions of the roles of outside responders, medical facilities and communities in the emergency response procedures are included.

Section 7.7 (Emergency Response) of the CMP also commits to the inclusion of relevant outside entities to ensure they are aware of the roles assigned to them in the ERP and be part in mock drills or implementation exercises.

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Standard of Practice 7.4:	Develop procedures for internal and external emergency notification and reporting.	
	$oxed{\boxtimes}$ in full compliance with	
The operation is	in substantial compliance with	Standard of Practice 7.4
	not in compliance with	
Summarise the basis for this Fi	nding/Deficiencies Identified:	
•	PLIANCE with Standard of Practice 7.4 received and reporting	
Section 7.7 (Emergency Respondence	onse) of the CMP lists commitments that re	elated to drafting procedures to
contact information for not medical facilities of the cyl	ifying management, regulatory agencies, anide emergency; and	outside response providers and
 contact information for notifying potentially affected communities of the cyanide related incident and any necessary response measures, and for communication with the media. 		
Standard of Practice 7.5:	Incorporate in response plans and ren elements that account for the addition treatment chemicals.	
	⊠ in full compliance with	
The operation is	in substantial compliance with	Standard of Practice 7.5
	not in compliance with	
Summarise the basis for this	Finding/Deficiencies Identified:	

The operation is in FULL COMPLIANCE with Standard of Practice 7.5 requiring an operation incorporate monitoring elements that account for the additional hazards of using cyanide treatment chemicals.

Evidence was observed that in Section 7.7 (Emergency Response) of the CMP, CEP has committed to drafting procedures that:

- describe specific remediation measures as appropriate for the likely cyanide release scenarios;
- prohibit the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water; and
- address the potential need for environmental monitoring to identify the extent and effects of a cyanide release, and include sampling methodologies, parameters and, where practical, possible sampling locations.

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process; and

implementation.

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Standard of Practice 7.6:	Periodically evaluate response procedures and capabilities and revise them as needed.	
	$oxed{\boxtimes}$ in full compliance with	
The operation is	in substantial compliance with	Standard of Practice 7.6
	not in compliance with	
Summarise the basis for this F	inding/Deficiencies Identified:	
•	PLIANCE with Standard of Practice 7.6 re and capabilities and revise them as need	
Evidence was observed that in procedures that include the rec	Section 7.7 (Emergency Response) of the quirement to:	e CMP, CEP has committed to draft
review and evaluate the c regular basis;		
 conduct periodic mock cy 	anide emergency drills as part of the eme	rgency response plan evaluation

review and evaluate the emergency response plan after any cyanide related emergency requiring its



PRINCIPLE 8 – TRAINING

Train Workers and Emergency Response Personnel to Manage Cyanide in a Safe and Environmentally Protective Manner

Standard of Practice 8.1:	Train workers to understand the hazards associated with cyanide use.	
	☑ in full compliance with	
The operation is	in substantial compliance with	Standard of Practice 8.1
	not in compliance with	
Summarise the basis for this	Finding/Deficiencies Identified:	
The operation is in FULL COMI understand the hazards associated	PLIANCE with Standard of Practice 8.1 re ated with cyanide use.	quiring an operation train workers to
Evidence was observed that in which include how to:	Section 7.8 (Training) of the CMP, CEP h	as committed to draft procedures
train all personnel who ma	ay encounter cyanide in cyanide hazard re	ecognition;
 conduct periodic refresher 	cyanide hazard recognition training; and	
retain records of cyanide h	nazard recognition training.	
Standard of Practice 8.2:	Train appropriate personnel to operate systems and procedures that protect and the environment.	
The operation is	in substantial compliance with	Standard of Practice 8.2
	not in compliance with	
Summarise the basis for this	Finding/Deficiencies Identified:	

The operation is in FULL COMPLIANCE with Standard of Practice 8.2 requiring an operation train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment.

Evidence was observed that in 7.8 (Training) of the CMP, CEP has committed to:

- training of workers to perform their normal production tasks, including unloading, mixing, production and maintenance, with minimum risk to worker health and safety and in a manner that prevents unplanned cyanide releases;
- the identification of training elements necessary for each job involving cyanide management in a training plan or other training materials;
- the employment of only appropriately qualified personnel to provide task training related to cyanide management activities;

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- training of employees prior to allowing them to work with cyanide;
- the provision of refresher training on cyanide management to ensure that employees continue to perform their jobs in a safe and environmentally protective manner;
- evaluating the effectiveness of cyanide training by testing, observation or other means; and
- retaining records throughout an individual's employment documenting the training they receive, the names of the employee and the trainer, the date of training, the topics covered, and if the employee demonstrated an understanding of the training materials.

Standard of Practice 8.3:	Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.	
	$oxed{oxed}$ in full compliance with	
The operation is	in substantial compliance with	Standard of Practice 8.3
	not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 8.3 requiring an operation train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.

Evidence was observed that in 7.8 (Training) of the CMP, CEP has committed to draft procedures that will detail:

- training of all personnel involved in cyanide unloading, mixing, production and maintenance of the procedures to be followed if cyanide is released;
- training of site cyanide response personnel, including unloading, mixing, production and maintenance workers, in decontamination and first aid procedures;
- training of Emergency Response Coordinators and members of the Emergency Response Team in the procedures included in the Emergency Response Plan regarding cyanide, including the use of necessary response equipment;
- informing and making familiar off-site Emergency Responders, such as community members, local responders and medical providers, with the relevant elements of the Emergency Response Plan related to cyanide;
- methodology of retaining records documenting cyanide training, including the names of the employee and the trainer, the date of training, the topics covered, and how the employee demonstrated an understanding of the training materials;
- refresher training for response to cyanide exposures and releases including its frequency; and
- operation of cyanide emergency drills for training purposes and their evaluation from a training perspective to determine if personnel have the knowledge and skills required for effective response. Cyanide emergency drills are evaluated from a training perspective to determine if personnel have the knowledge and skills required for effective response. Training procedures are revised if deficiencies are identified. Debriefs following an emergency response drill are always conducted.

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PRINCIPLE 9 – DIALOGUE

Engage in Public Consultation and Disclosure

Standard of Practice 9.1:	Provide stakeholders the opportun concern.	ity to communicate issues of
	oxtimes in full compliance with	
The operation is	in substantial compliance with	Standard of Practice 9.1
	not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 9.1 requiring an operation provide stakeholders the opportunity to communicate issues of concern.

CEP has drafted procedures or committed to provide the opportunity for stakeholders to communicate issues of concern regarding the management of cyanide. CEP has also:

- developed a Social Management Strategy to manage the social aspects of the project;
- established a Community Relations and Development Department, overseen by a senior on-site operations manager, to steer and coordinate the Social Management Strategy;
- developed a Public Consultation and Disclosure Plan.
- included a section in the CMP (Section 7.9, Dialogue) which summarises the strategy the approach CEP plans to employ to steer its public consultation process; and
- developed a Public Information Centre (PIC) which will be a key component of the public outreach strategy. Responses to frequently asked questions will be prepared in written format and made available at the PIC.

Standard of Practice 9.2:	Initiate dialogue describing cyanide management procedures and responsively address identified concerns.	
	☑ in full compliance with	
The operation is	in substantial compliance with	Standard of Practice 9.2
	not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 9.2 requiring an operation initiate dialogue describing cyanide management procedures and responsively address identified concerns.

Section 7.9 (Dialogue) of the CMP commits the operation to provide opportunities for interacting with stakeholders and providing them with information regarding cyanide management practices and procedures. The opportunities include public meetings, conducting site tours and the dissemination of simplified technical literature to the local communities or community leaders.

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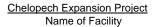


Standard of Practice 9.3:	Make appropriate operational and environmental information regarding cyanide available to stakeholders.	
	$oxed{\boxtimes}$ in full compliance with	
The operation is	in substantial compliance with	Standard of Practice 9.3
	not in compliance with	
Summarise the basis for this	Finding/Deficiencies Identified:	
•	PLIANCE with Standard of Practice 9.3 re vironmental information regarding cyanide	, ,
management activities in local la stakeholders. Where a significa	MP commits the operation to develop writ anguages and make these available to th ant percentage of the population is illiterat verbal form via community meetings in th	e local community and other te, Dundee will ensure that the

The CMP also commits Dundee to make information publicly available on confirmed cyanide release or exposure incidents and identified the method(s) to be used.

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Date



Report Signature Page

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APPENDIX A

Limitations



LIMITATIONS

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