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INTERNATIONAL CYANIDE MANAGEMENT CODE

Australian Gold Reagents – Production Facility
Recertification Audit
Summary Audit Report

Prepared for
Australian Gold Reagents
October 2026
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UNITED STATES OF AMERICA

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1 INTRODUCTION

1.1 Operational Information

Name of Production Facility:	Kwinana Sodium Cyanide Production Facility
Name of Facility Owner:	Australian Gold Reagents Pty Ltd
Name of Facility Operator:	CSBP Pty Ltd
Name of Responsible Manager:	Brett Marsh, Operations Superintendent
Address:	Kwinana Beach Road, Kwinana
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1.2 Description of operations

1.2.1 Australian Gold Reagents Pty Ltd (AGR)

AGR is the management company of the unincorporated joint venture between CSBP Ltd (CSBP) and Coogee Chemicals Pty Ltd (Coogee Chemicals). CSBP, a subsidiary of Wesfarmers Ltd is the major participant in the venture and acts as both plant operator and sales agent. Coogee Chemicals is a local manufacturer and distributor of industrial chemicals.

AGR in its capacity as the sales agent is the consigner and is responsible for the overall management of the cyanide transportation activities.

1.2.2 Kwinana Production Facility

AGR's Kwinana Cyanide Production Facility is located within CSBP's fertiliser and chemicals complex at Kwinana, some 40 km south of Perth within the state of Western Australia. AGR produces and transports two different forms of sodium cyanide from the Kwinana production facility, namely solution and solids. Sodium cyanide solution is produced as a 30% strength liquid and solid sodium cyanide as a >97% strength white briquette.

The key elements of infrastructure at the cyanide facility at the time of this audit are:

- Reaction facilities with three units
- Liquid cyanide storage tanks, located within an open concrete lined bund
- Sodium hydroxide tank farm
- Production facilities with three units
- A products warehouse for storage of packaged solid sodium cyanide
- Liquid cyanide loading facility (platform and fill lines) on rail line
- Paved external storage area for containers and isotainers
- Decontamination/clothes change facility
- Two administration buildings
- Control room
- Air emission treatment facilities
- Wastewater treatment facilities.

The facility operates on 8-hour shifts, 24 hours per day, seven days per week, with four production teams.

The production facility completes the packaging and labelling of cyanide product ready for distribution by road or rail from the facility to customers locally or internationally via export through the Port of Fremantle. AGR's production facility was recertified in full compliance with the Code on 28 August 2023.

Important Note:

The operation initiated a major plant expansion project in December 2025 that is due for completion late 2026/early 2027. The engineering, QA/QC and management of change aspects of this major capital project and the associated changes to infrastructure and procedures has not been fully evaluated within the scope of this audit and will need to be evaluated in the next recertification audit.

1.3 Auditors Finding and Attestation

☒ in full compliance with

AGR is: ☐ in substantial compliance with
☐ not in compliance with

**the International Cyanide
Management Code**

This operation has not experienced compliance issues or significant cyanide incidents during the previous three-year audit cycle.

Audit Company: Enpoint

Audit Team Leader: Mike Woods, Exemplar Global (113792)

Email: mikewoods@enpoint.com.au

1.4 Name and Signatures of Auditors

Name	Position	Signature	Date
Mike Woods	Lead Auditor and Production Technical Specialist		1.10.2026
Jeff Shivak	Auditor		1.10.2026

1.5 Dates of Audit

The Audit Team was undertaken by Mike Woods of Enpoint, an ICMI pre-certified Lead Auditor and Jeff Shivak. The field component of the audit concluded on 18 June 2026. Due to operational needs and changes in key personnel the audit was completed over 6 person days:

- 3 to 5 November 2025 to accommodate major expansion project commencement.
- 2 February and 18 June 2026 due to changes/availability of key personnel.

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 Cyanide Production Verification Protocol for the International Cyanide Management Code and using standard and accepted practices for health, safety and environmental audits.

2 PRODUCTION VERIFICATION PROTOCOL

PRINCIPAL 1 – OPERATIONS

Design, construct and operate cyanide production facilities to prevent release of cyanide.

Production Practice 1.1

Design and construct cyanide production facilities consistent with sound, accepted engineering practices and quality control/quality assurance procedures.

☒ in full compliance with

AGR is: ☐ in substantial compliance with

Production Practice 1.1

☐ not in compliance with

AGR is in FULL COMPLIANCE with Production Practice 1.1 requiring the design and construction of cyanide production facilities consistent with sound, accepted engineering practices and quality control/quality assurance procedures.

Quality assurance and quality control QA/QC records are retained. The availability of the facility's manufacturer's design report (MDR) and other technical records were confirmed. AGR maintains a comprehensive technical library which makes readily available a wide range of documents and records relating to the implementation of quality assurance and control programmes for the Cyanide Business.

There have been minor modifications within the plant during the audit period and but not to cyanide production and storage facilities. Repair work to Tank 3 was completed during the audit period involving carbon fibre patching to identified areas. A condenser tank was replaced with a slightly larger capacity vessel and QA/QC records/as built drawings were available for this tank together with management of change documentation. There have been no other new cyanide related facilities constructed during the audit period.

A review of QA/QC documentation confirmed that appropriately qualified personnel are involved in the design and review process.

QA/QC documentation is available and retained by the operations.

AGR adheres to international and engineering standards in the manufacturing of cyanide production facility infrastructure. CSBP's technical services team maintain materials specifications defining what materials are accepted for use at the facility. The production facility is in the process of upgrading from carbon steel pipe to stainless steel pipe, both materials are recognised as being compatible for use with liquid sodium cyanide.

The operation initiated a major modification project to the production facility that is due for completion in late 2026/early 2027 and these components will need to be assessed in the next recertification audit.

Automatic systems, or "interlocks", to shut down production systems and prevent releases due to power outages or equipment failures are in place. The current plant is built a vacuum plant that draws feed gases through the plant. The plant is controlled by a DCS and there are automatic systems to safely shutdown the plant.

Cyanide is managed on concrete surfaces. Cyanide solution storage tanks are located within a concrete bund, positioned on I beams on concrete plinths. The rail loading facility has concrete apron beneath the loading platform that drains into the cyanide storage bund.

The solution components of the production facility are located within concrete bunds and a separate bund is provided for the destruction circuit. The box packaging facility is positioned within a building with a concrete floor. The solution to solids filling station is positioned externally to the solids building with a dedicated bund draining to the wastewater management facility.

The site has an Asset Integrity Team that evaluate the condition of the plant including concrete bunds and pavements. There is a periodic inspection program that is completed. The site inspection confirmed the bunds are in serviceable condition with evidence of periodic repairs.

Rail loading station has a DCS with fill level controls to prevent overtopping of the isotainers during filling. There are level indicators on the cyanide storage tanks that are monitored via the DCS in the control room.

There have been no changes to the secondary containments and largest vessels during the audit period. Secondary containment capacity has been assessed during previous audits.

Spill prevention and containment measures are provided for all cyanide solution pipelines. The site inspection confirmed that all cyanide solution pipes between containments are configured in overhead pipe in pipe or pipe in tray design. In the event of a leak, pipe trays are designed to prevent pooling and drainage mechanisms are in place that drain any solution into a contained area.

The facility stores cyanide in a manner that minimises the potential for exposure of cyanide to moisture, with adequate ventilation to prevent the build-up of hydrogen cyanide (HCN) gas, in a secure area and separately from incompatible materials. Access to the whole cyanide plant is controlled with perimeter security, CCTV and access control systems in place.

The process plant produces two product streams, a liquid sodium cyanide that is stored within external tanks and within loaded isotainers ready for shipment. And solid sodium cyanide that is either packaged in lined intermediate bulk containers or loaded into dedicated solid to solution isotainers. Hydrocyanic acid is not produced on this plant.

The areas where the tanks are located are provided with adequate ventilation to prevent the build-up of hydrogen cyanide gas. A small quantity of solid product is temporarily stored in IBCs within the warehouse area of the boxing filling facility, and then within shipping containers within a secure external storage area. The solid packaging and warehouse facility is separate from other areas of the plant and has fire detection systems installed including laser and thermal sensors and the facility has removed ignition sources to the extent practical. The warehouse does not have suppression or sprinkler system, and the response in the event of a fire is evacuation and external containment to prevent fire spreading to other areas of the facility.

Production Practice 1.2

Develop and implement plans and procedures to operate cyanide production facilities in a manner that prevents accidental releases.

☒ **in full compliance with**

AGR is: ☐ in substantial compliance with

☐ not in compliance with

Production Practice 1.2

AGR is in FULL COMPLIANCE with Production Practice 1.2 requiring the development and implementation of plans and procedures to operate cyanide production facilities in a manner that prevents accidental releases.

The facility has developed formal procedures that describe the standard practices necessary for its safe and environmentally sound operation. The facility is a Major Hazard Facility (MHF) and there is a Safety Case that provides the basis for the safe operation of the facility. The facility has procedures that describe the standard practices necessary for its safe and environmentally sound operation.

The facility has developed formal procedures for contingencies during upsets in its activities that may result in cyanide exposures or releases. Some procedures are specific to a contingency, whilst others contain contingency measures within a standard operating procedure.

The operation does have procedures to identify when site operating practices have or will be changed from those on which the initial design and operating practices were predicated. Any engineering change to plant or equipment including modification, improvement, new plant or plant upgrade, for which design and engineering input is required is defined as a Project and is subject to a Project Authorisation process. Environmental and safety personnel are involved in the review and evaluation process for modifications prior to implementation. The procedures were applied to the recent upgrade of the waste handling area.

A comprehensive preventative maintenance (PM) system has been established in the Maintenance System. PM routines are performed daily and weekly and are carried out in accordance with the relevant maintenance procedures. Documented records are kept on hand and collected weekly by the relevant Heads of Department. The PM system generates work orders for the upkeep of infrastructure or the repair of identified faults.

Process parameters are monitored with necessary instrumentation, and the instrumentation is calibrated according to manufacturer's recommendations. In situ monitoring occurs at various locations along the production cycle. Flow, temperature, pH, pressure, and process emissions are continuously monitored, and data is displayed live on the DCS in the control room. Plant Operators monitor process parameters via the DCS, routine plant rounds and daily checks and tests.

Procedures are in place and are being implemented to prevent unauthorised/unregulated discharge to the environment of any cyanide solution or cyanide-contaminated water that is collected in a secondary containment area. Stormwater generated onsite is managed in accordance with licence conditions, with all collected stormwater subjected to analytical testing prior to controlled discharge as wastewater. Monitoring frequencies and analytical requirements are defined in the site's operating licence.

The facility has environmentally sound procedures for the disposal of cyanide or cyanide-contaminated solid waste. The solid waste management procedure applies to all solid waste produced on site and all personnel involved in the generation, storage and disposal of solid wastes.

The operation has developed a system to contain and test residue removed from plant sumps as part of maintenance of the facility. The material is taken to a dedicated area with geobags used to contain fine particulate material to enable testing and offsite disposal to a suitable class of landfill.

The facility also has procedures to manage off specification product and recover the cyanide back into the process to avoid generation of waste.

There are procedures in place to ensure that cyanide is packaged to a standard that will meet the requirements of the political jurisdictions through which it will pass. A site inspection confirmed that labels are attached to solid sodium cyanide with global harmonised system compliant labelling.

Production Practice 1.3

Inspect cyanide production facilities to ensure their integrity and prevent accidental releases.

☒ **in full compliance with**

AGR is: ☐ in substantial compliance with

Production Practice 1.3

☐ not in compliance with

AGR is in FULL COMPLIANCE with Production Practice 1.3 requiring inspection of cyanide production facilities to ensure their integrity and prevent accidental releases.

The facility conducts routine inspections of tanks, valves, pumps, pipelines, containments and other cyanide production and storage facilities. The CSBP Reliability Support Plant Inspection Section has been established to provide competent persons to perform the required inspections and to manage the Plant Inspection Processes. All completed inspections result in a detailed report and corresponding work orders (if required). Work orders are given a priority ranking and entered into JDE for tracking towards completion. JDE is a maintenance system software application used by the operation.

Inspection frequencies are sufficient to assure that equipment is functioning within design parameters. Frequencies are determined by a number of factors; statutory requirements for pressurised equipment, risk assessments and preventative maintenance routines. Risk assessments can be used to extend the time between inspections where AGR have knowledge of historical performance and operating conditions remain the same.

The facility has documented inspections that are retained. The documentation identifies specific items to be observed and includes the date of the inspection, the name of the inspector, and observed deficiencies.

Inspection findings are documented via individual reports and the contents of the inspection reports contains information about the type of inspection, the name of the inspector and what the outcomes were. Inspection reports are issued to the plant/equipment owners with any recommendations included as work orders.

PRINCIPAL 2 – WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

Production Practice 2.1

Develop and implement procedures to protect facility personnel from exposure to cyanide.

☒ **in full compliance with**

AGR is: ☐ in substantial compliance with

Production Practice 2.1

☐ not in compliance with

AGR is in FULL COMPLIANCE with Production Practice 2.1 requiring the development and implementation of procedures to protect facility personnel from exposure to cyanide.

The facility has developed formal procedures to minimise worker exposure, during normal plant operations, from receipt of raw materials through to finished product packaging and shipping. There are a series of procedures covering different components of the plant addressing normal operations, inspections, decontamination for maintenance and responding process upsets. The procedures are controlled through an electronic document management system DOCOVA that includes version controls, editing rights and publishing of the latest version.

There are procedures addressing the isolation and preparation of the plant ready for maintenance activities to minimise potential for exposure to cyanide. The operation as established isolation and permit to work procedures. Operational personnel are responsible for shutting down, isolating and flushing the area of the plant to be worked on. Maintenance personnel confirm isolations are in place prior to commencing maintenance tasks. Higher risk maintenance activities are completed using a buddy system. Where confined space entry is necessary additional training, permits, rescue plan and sentries are utilised.

The facility does solicit and considers worker input in developing and evaluating health and safety procedures. The facility has established a health and safety committee that meets monthly on site and there are formalised agenda and minutes for this meeting that includes consideration of safety matters. Individual departments also hold their own regular safety meetings. Every shift has its own Safety Representative and Stop (Take 5) Assessments are collected and reviewed by senior safety personnel.

The site has a structured procedural review process where the work crews review operating procedures and provide recommended changes on controls and steps. Proposed changes are considered through a tiered review process. The updated process is communicated via toolbox meetings with updated procedures published on DOCOVA.

The facility has identified areas and activities where workers may be exposed to cyanide gas or cyanide dust and has implemented a combination of personal protective equipment and procedural controls for these areas. Fixed gas detectors are positioned strategically across the plant with five installed in the solids plant and four in the liquids plant. These are set to alarm at 4.5 ppm.

The solids plant box filling area is a recognised 'red zone' mandating the use of additional personal protective equipment with workers entering and exiting the area via the decontamination room. The red zone personnel protective equipment includes orange overalls, chemical resistant gloves, black boots/wellington boots, full faced canister mask with ABEK 1 (ABEK is a coding system for various gas/vapour threats). canister fitted or Jupiter helmet with ABEK 1 canisters, ear plugs, PVC chemical resistant sleeve protectors and personal HCN gas monitor.

Task procedures detail where additional personal protective equipment is needed.

The facility uses monitoring devices to confirm that controls are adequate to limit worker exposure. Personal HCN monitors are available and used in designated areas. The devices are set to alarm at 4.7 ppm.

The fixed in place gas detectors are a series of nine (9) in situ monitoring devices – five in the Solids Plant and four in the Liquids Plant these are set to alarm at 4.5 ppm.

If hydrogen cyanide gas or dust levels trigger the 4.5 ppm and 4.7 ppm alarm levels on the fixed and portable monitoring equipment personnel must leave the area to fresh air and notify the permit office/operations. Operations must then inspect the area and conduct gas testing while wearing air purifying respirators.

HCN monitoring equipment is maintained in accordance with manufacturer's requirements. The internal Project Maintenance system prompts personnel when calibration of equipment is due.

Calibration is undertaken every six months on fixed devices, with replacements occurring after 12 months.

Portable devices are bump tested daily when docked onto the docking/charging station in the control room. Monthly gas calibration tests are conducted. Hygiene data and calibration records are kept and maintained by the Hygiene department. The operation has provisions in place to retain hydrogen cyanide monitoring equipment calibration records for at least three years.

The facility does have provisions to ensure that a system is used where workers can notify or communicate with other personnel for assistance, help or aid where it has determined it necessary.

Anyone entering the plant must report to the control room and notify the areas of the plant to be visited or worked in. There are provisions for the use of buddy system in the red zone and for personnel to carry two-way radio for other areas of the plant.

Each work team has a supervisor that oversees the work crew and can raise the alarm verbally. Work crews are a minimum of two people plus a supervisor or team leader based in the control room. The control room has both radio contact and CCTV visuals of the personnel in the plant.

Emergency showers and eye wash facilities are alarmed and displayed electronically in the control room. If a facility is used, then the corresponding icon and location will sound/flash to notify supervisors in the control room.

The facility assesses the health of employees to determine their fitness to perform their specified tasks, AGR, through its on-premise medical centre assesses the health of its employees.

The operations health surveillance process covers both pre- employment and ongoing health assessments. There is an established process for functional assessments based on the physical demands of the role. This process includes respirator function and fit testing to confirm workers can wear the necessary respiratory protective equipment within the cyanide plant. Health surveillance assessments are completed every 2 years for general personnel and every year for the emergency response team.

AGR conduct both causal and random drug and alcohol screening tests. The operation also has a pass/fail blood alcohol assessment device that is used by site security for assessment of personnel entering the site on a suspect and random basis.

The facility does have a clothing change policy or procedure for employees, contractors and visitors to areas with the potential for cyanide contamination of clothing. There is a decontamination hut used for changing into and out of PPE and for the segregation of clean and contaminated PPE. There are boot wash facilities both upon leaving the contaminated plant area and inside the decontamination hut. There are showers and hand wash facilities in the clean area. It is mandatory to use the Decon hut following working in red zones.

The facility does have warning signs advising workers that cyanide is present and that, if necessary, suitable PPE must be worn. Warning signs are posted advising workers that cyanide is present and the necessary PPE that must be worn. Signage is placed at strategic locations around the facility including the front entrance to the site, entrance to sodium cyanide solution plants (SCP) SCP1, SCP 2, sodium cyanide solids plant (SCS) and the decontamination hut and entrance to the red/yellow PPE areas. Warning signs indicate that cyanide is present and that smoking, eating and drinking is prohibited, they also specify what PPE is required. These messages are reinforced in the Sodium Cyanide Manufacturing Facility Induction.

Personnel are prohibited from smoking, eating and drinking anywhere on site other than in the signed and designated areas. There is a designated smoking area and several designated crib rooms available for the safe storage and consumption of food and water. The facility also has several safe drinking fountains with foot-activated covers, to avoid contamination.

Signage is displayed at the main entry gate and at the access point to the production site to communicate these prohibitions. Additional signs are displayed throughout the SCP 1, SCP 2, SCS and packaging areas to prohibit smoking, eating and drinking and having open flames. A work permit and hot work certificate is required prior to any open flames being permitted.

These messages are reinforced in the Sodium Cyanide Manufacturing Facility Induction. This procedure is designed to outline area specific hazards and provide persons entering the facility with information necessary to orientate themselves safely within the work area.

Production Practice 2.2

Develop and implement plans and procedures for rapid and effective response to cyanide exposure.

☒ **in full compliance with**

AGR is:

☐ in substantial compliance with

Production Practice 2.2

☐ not in compliance with

AGR is in FULL COMPLIANCE with Production Practice 2.2 requiring the development and implementation of plans and procedures for rapid and effective response to cyanide exposure.

The facility has developed specific written emergency response plans and procedures for responding to cyanide exposures. Procedures cover actions when responding to an alarm including calling the site emergency number, personal decontamination and providing first aid (where safe to do so). There is a formal tiered emergency response process with specific procedures for medical response, the emergency response team and incident management team.

Showers, low-pressure eye wash stations and non-acidic fire extinguishers are located at strategic locations throughout the plant. The safety showers, when activated, generate an alarm in the control room indicating the location to respond to. The showers, eyewash stations and extinguishers are inspected and tested on a regular basis. Weekly tests are conducted on the emergency wash facilities in accordance with preventative maintenance routines. Selected shower and eye wash facilities were tested and worked suitably and alarmed in the control room. Dry powder fire extinguishers were observed and confirmed that these are checked every 6 months by a third-party specialist provider.

The facility does have water, oxygen, antidotes and a means of emergency communication readily available for use in the plant. The location and availability of oxygen and antidote kits was confirmed during the site inspection. Operators carry two-way radio's and are in regular communication with the control room. In addition to resources within the plant there is a medical clinic on the broader site with an occupational health nurse during day shift.

The first-aid and emergency response equipment is stored and tested as directed by their manufacturer and replaced on a schedule. Personnel check the first aid equipment weekly as part of the routine hazard and housekeeping self-audit system. Oxyports are maintained and tested by accredited third parties in accordance with the manufacturer's instructions. If an item fails a test, it is replaced. The cyanide antidote present on the site are hydroxocobalamin CYANOKIT and the facility stores the cyanide antidote as directed by the manufacturer specifications. The operation has not had cause to use the kits to date.

Safety data sheets and first aid procedures on cyanide safety are in the language of the workforce (English) and are available to workers at the site. All the signs and procedures are in English, which is the official language.

Storage tanks, process tanks, containers and piping that contain cyanide are labelled to alert workers and identify their contents. During the site walkover, lines observed were labelled to alert workers of their contents and direction of flow. All tanks observed were clearly labelled to alert workers of their contents.

The facility has a decontamination policy and procedures for employees, contractors and visitors leaving the areas with the potential for skin exposure to cyanide. The sodium cyanide plant risk controls and decontamination processes outline the actions to be carried out by personnel and visitors in the event of a potential contamination by cyanide. Workers at the site complete the AGR Cyanide Awareness training that includes information and instruction on good hygiene practices when working around chemicals. Information is provided through the site induction process.

The operational procedure is supported by the Sodium Cyanide Response to Emergency Situations Procedure further details decontamination and the use of safety showers.

The facility has its own on-site capability to provide first response and immediate first aid treatment. The site has a number of trained first aid responders that are based at the facility and first aid equipment located at the main office. There is an onsite medical clinic with an occupational health nurse available during weekday normal hours. After hours first aid response is provided by the Shift supervisors with established procedures to transport injured parties to offsite medical support.

The facility has developed procedures to transport exposed workers to locally qualified, off-site medical facilities. The facility's medical centre does not communicate on a regular basis with local hospitals as the treating doctors can change very regularly. It does however put together robust processes to ensure that all information relating to exposure incidents travels with the patient and is available to the treating hospital.

Cyanide antidote kits also travel with the exposure victim to the hospital. Procedures outline the transfer to one of two hospitals by accredited third party ambulance service providers.

The facility has alerted local hospitals, clinics, etc. of the potential need to treat patients for cyanide exposure. The operation has sought and received confirmation from the state health department on the capability of hospitals to treat a worker who may have been exposed to or poisoned by cyanide. They undertake a yearly check that the capability has been retained.

Procedures are in place to investigate and evaluate cyanide exposure incidents to determine if the operations programmes and procedures, to protect worker health and safety and to respond to cyanide exposures, are adequate or need to be revised. The facility has a formalised incident reporting procedure and Incident Management System, which is a computerised database for collection of incident related data.

A review of the incident management system for the audit period indicates that potential exposure incidents have been reported and investigated. Of the incidents reported during the audit period several related to confirmed contact with cyanide bearing material but none involving higher level medical intervention or use of antidotes. There have been no reported releases of cyanide to the environment at the site.

PRINCIPAL 3 – MONITORING

Ensure that process controls are protective of the environment.

Production Practice 3.1

Conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.

☒ in full compliance with

AGR is: ☐ in substantial compliance with

Production Practice 3.1

☐ not in compliance with

AGR is in FULL COMPLIANCE with Production Practice 3.1 requiring environmental monitoring to be conducted to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.

The facility conducts routine cyanide monitoring for all regulated discharge pathways, including surface water outfalls and both surface water and groundwater monitoring wells located upgradient and downgradient of the site. Stormwater generated onsite is managed in accordance with licence conditions, with all collected stormwater subjected to analytical testing prior to controlled discharge as wastewater. Monitoring frequencies and analytical requirements are defined in the site's operating licence (L6110/1990/13), Groundwater Operating Strategy, and Wastewater Sampling Procedure, which specify the required spatial coverage and temporal sampling intervals for both surface water and groundwater monitoring networks. The Groundwater Operating Strategy has been submitted to and accepted by the environmental regulator.

The facility does not have routine direct discharge of cyanide-containing wastewater to surface waters. All run-off and potential spills collected outside bunded areas are directed via the site stormwater drainage system to one or more of four stormwater sumps. Wastewater contained in the sumps is tested for pH and cyanide concentration prior to transfer.

Where pH or cyanide concentrations are outside specification, wastewater is diverted to the tank farm for re-integration into finished product or for further treatment. Where suitable for discharge, wastewater is transferred to CSBP's containment pond following treatment and verification sampling.

Final discharge from the containment pond occurs via the Water Corporation-owned Sepia Depression Ocean Outlet Landline (SDOOL) following treatment through a nutrient stripping wetland system. Wastewater discharged via this pathway is monitored and no exceedances of free cyanide have been recorded.

The operation can demonstrate that indirect discharges do not cause exceedances of free cyanide in receiving waters.

All run-off and potential cyanide-contaminated water generated outside bunded areas is directed to the site stormwater drainage system, which collects flow into one or more of four stormwater sumps. Wastewater within the sumps is tested for pH and cyanide concentration prior to further management. Where pH or cyanide concentrations are outside specification, wastewater is diverted to the tank farm for reintegration into finished product or for further treatment.

Wastewater suitable for discharge is managed through a controlled treatment train comprising ammonia stripping, reverse osmosis, and cyanide destruction. Concentrate streams are returned to the solids plant, and treated water is routed through a cyanide destruction tank. Following treatment and verification sampling, wastewater passes through an online, in-situ monitoring device located at the facility boundary prior to release to CSBP's containment pond.

From the containment pond, the preferred and most commonly used disposal pathway is via the SDOOL. Prior to discharge to the SDOOL, wastewater is treated through a nutrient stripping wetland

system and sampled and analysed. CSBP's contribution represents approximately two percent of the daily total volume discharged, which discharges approximately four kilometres offshore from Point Peron, providing substantial dilution and mixing.

Wastewater monitoring results confirm that free cyanide concentrations are below applicable analytical detection limits, with no recorded exceedances. On this basis, and taking into account the multiple treatment steps, operational controls, verification monitoring, and dilution within the receiving environment, the operation demonstrates that indirect discharges do not result in in-stream free cyanide concentrations exceeding 0.022 mg/L.

Monitoring well 01MR015S has recorded low-level cyanide detections slightly above the Environmental Quality Criteria (EQC) but below the Non-Potable Use Guidelines (NPUG). Due to the operations proximity to the marine environment, the presence of cyanide in groundwater to result in an indirect discharge was evaluated.

Review of the Stage 3 Hydrogeological Conceptual Site Model (HCSM), numerical groundwater modelling, and Detailed Site Investigation (DSI) indicates that cyanide impacts detected at 01MR015S are unlikely to reach the marine environment at concentrations that have the potential to pose a risk to aquatic ecological receptors of Cockburn Sound.

Numerical groundwater modelling confirms that groundwater originating from the vicinity of 01MR015S would migrate laterally within the QS aquifer, with slow velocities and progressive attenuation, prior to any potential interaction with the shallow coastal discharge zone. Additionally, down-gradient monitoring wells between 01MR015S and the Indian Ocean contained concentrations of cyanide either below the EQC or below the laboratory limit of reporting, which indicates a lack of plume continuity toward the marine boundary.

Based on the low magnitude of detections, lack of hydraulic connectivity to the coastal upwelling zone and absence of plume continuity, the auditor accepts that cyanide impacts identified at 01MR015S has not presented an indirect discharge.

Beneficial uses of groundwater have been identified at the site and numerical standards for cyanide species have been established. Groundwater monitoring is undertaken in accordance with the Department of Water and Environmental Regulation (DWER) approved Groundwater Operating Strategy, which requires routine sampling of groundwater from an extensive network of monitoring wells completed in both the Quaternary Sands (QS) and Tamala Limestone (TL) aquifers.

Groundwater quality results are assessed against the Non-Potable Use Guidelines (NPUG), which are relevant due to the use of groundwater for industrial and irrigation purposes, and against the Environmental Quality Criteria (EQC) for Cockburn Sound due to the site's proximity to the marine environment. Where EQC values are not available, groundwater quality is assessed against applicable Marine Water guidelines.

Monitoring data collected during the audit period indicate that cyanide concentrations in groundwater monitoring wells at the site are at or below levels protective of identified beneficial uses. Low-level cyanide detections recorded at monitoring well 01MR015S appear localised. These detections do not result in exceedances of the adopted guideline values at downgradient compliance locations and do not compromise the protection of groundwater beneficial uses, as confirmed through ongoing monitoring and assessment.

Cyanide has been detected in groundwater in the vicinity of 01MR015S. The levels recorded are below NPUG for the identified beneficial use. Ongoing groundwater monitoring remains in place to confirm the continued stability and attenuation of this localised impact.

The operation can demonstrate that the levels of atmospheric process emissions of HCN gas or cyanide dust are limited in order to protect the health of workers and the community. The atmospheric

emission limit for total cyanide as set in L6110/1990/13 is 0.58 gr/sec. Quarterly stack tests are carried out and there were no exceedances reported for the audit period.

Monitoring is conducted at frequencies adequate to characterise the medium being monitored and to identify changes in a timely manner. The facility monitors for cyanide in discharges to surface water and in groundwater both up and down gradient of the site. Groundwater monitoring is undertaken on a biannually at key locations. Monitoring is conducted at frequencies adequate to characterise the medium being monitored and to identify changes in a timely manner.

PRINCIPAL 4 – MONITORING

Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.

Production Practice 4.1

Train employees to operate the facility in a manner that minimizes the potential for cyanide exposures and releases.

☒ in full compliance with

AGR is:

☐ in substantial compliance with

Production Practice 4.1

☐ not in compliance with

AGR is in FULL COMPLIANCE with Production Practice 4.1 requiring the training of employees to operate the facility in a manner that minimizes the potential for cyanide exposures and releases.

The facility does train workers to understand the hazards of cyanide and refresher training is periodically conducted. Employees are required to complete a CSBP Learning Agreement upon commencement of employment. A user guide for sodium cyanide plant training modules identifies relevant modules and explains the competency-based training program.

The operation utilises an electronic learning management system (LMS) to manage and track training across the organisation. Underpinning this system is a competency framework that details the training and competencies for each role (profile) and individuals are allocated a defined profile within the system that schedules and tracks completion of required training models.

Training is delivered via a variety of methods including online, peer-peer, classroom and via third party training organisations. The operation has a formal competency-based training system aligned with the Australian Qualifications Framework.

The facility does train workers in the use of personal protective equipment (PPE) and has identified when and where this equipment is required. The primary training provided on PPE is through the induction process and peer to peer training process when commencing at the operation. Site signage indicates the areas where additional PPE is needed. The site inspection confirmed signage is in place detailing the PPE needed. Personnel were observed to be wearing the PPE designated for the area they were in.

The production facility is a complex chemical plant and there is a structured training program covering general safe work and environment controls for the operating environment. Workers are trained on elements of the plant by senior operators and the site trainer before being able to perform tasks. This

includes training on isolations, tagging systems, confined space, and other higher risk activities on site.

The worker is progressively on tasks and activities across the plant with formal competency assessment completed and passed before they are allowed to work independently on those tasks or activities.

The Facility has a site induction programme that provides the overview of site safety rules and requirements. Workers new to the area of the plant are buddied with an experienced operators and progressively trained. Once deemed competent they can complete task independently.

The facility does provide refresher training. The inductions are periodically repeated to cover updates and changes in the operation and safe work practices.

The facility has implemented a scenario training package that covers the operating areas of the plant targeting troubleshooting and problem-solving plant operations. This system provides both refresher training and improvement identification.

The training elements necessary for each job are identified in the training materials. AGR has developed a training matrix to manage the training requirements for employees at the facility. Learning pathways have been developed that outlines the information for the candidate and the assessor and how the module fits in with career progression. These materials are managed through the DOCOVA which contains the training modules and assessments as required by each area of the plant.

Internal training is provided by CSBP/AGR personnel with adequate qualification and levels of experience for the training being provided. Training is provided on the job by supervisors and then further training and assessment is provided by trained assessors. Externally, training is completed via registered training organisations and where practical, training is completed to a nationally recognised level of competency.

The Facility evaluates the effectiveness of cyanide training by testing. Evaluation questionnaires are used to evaluate the effectiveness of training. The documentation on which these evaluations have been based is filed in individual staff files. The evaluations are conducted in English, which is the official language.

Production Practice 4.2

Train employees to respond to cyanide exposures and releases.

☒ **in full compliance with**

AGR is: ☐ in substantial compliance with

Production Practice 4.2

☐ not in compliance with

AGR is in FULL COMPLIANCE with Production Practice 4.2 requiring the training of employees to respond to cyanide exposures and releases.

The facility trains employees in the procedures to be followed in the event that a cyanide release is discovered. The tiered induction process provides instructions and information on identifying and reporting emergencies including raising the alarm, evacuation and first aid. All workers entering the facility are provided with this training. Each Standard Operating Procedure describes the steps to be taken in the event of an emergency situation involving a release. Evidence was available and sighted of emergency response training.

In addition to the training provided to personnel that enter and work in the cyanide manufacturing plant area the operation provides training to emergency response team members and to the incident management team (IMT). The emergency response team receive tactical accredited training in hazardous materials response, confined space rescue, firefighting, use of breathing apparatus and first aid. The IMT receive scenario-based training on coordinating response to incidents.

The facility trains workers in how to respond to emergency situations involving worker exposure to cyanide. Workers are instructed to head to the nearest emergency shower and commence decontamination if they suspect they have been in contact with cyanide. An alarm is triggered in the control room, and emergency response is activated.

ERT and nurse respond (when onsite) and oxygen is taken to the person. Incident reports and personnel interviewed during the audit confirm these actions are understood and completed by personnel responding to incidents. The ERT participate in routine drills and training days to test and maintain their response skills. The training days are split across the crews and involve theory and practical components.

Training records are retained throughout an individual's employment, documenting the training they have received and 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. Training files for workers were reviewed and contained evidence of training including course content, assessments and certificates. Where external training is conducted, certificates of attendance or attainment are retained on the individual's file.

PRINCIPAL 5 – EMERGENCY RESPONSE

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

Production Practice 5.1

Prepare detailed emergency response plans for potential cyanide releases.

☒ in full compliance with

AGR is: ☐ in substantial compliance with

Production Practice 5.1

☐ not in compliance with

AGR is in FULL COMPLIANCE with Production Practice 5.1 requiring the preparation of detailed emergency response plans for potential cyanide releases.

The facility has developed a series of emergency response plans and procedures for the management of cyanide related emergencies.

CSBP-RM-11-010-02 Management of Emergencies is referenced in the Safety Report and provides for three levels of emergencies and associated guidance on the level of response. It details the steps taken to respond to an emergency and how the response capacity is maintained at a level that minimises the risk to people, property, the environment, business activities and company reputation.

CSBP-GM-11-013-01 Kwinana Emergency Response Teams describes the composition, training, performance standards, duties and responsibilities of the CSBP Emergency Response Teams (ERTs). Within *CSBP-GM-11-013-01* is a list of Standard Operating Procedures (SOPs) that describes the steps to be taken in the event of incident involving a release. *CSBP-DP-11-015-01 Kwinana Works Muster* details the site evacuation and how personnel on the site are safely assembled and accounted for in the event of a works muster being required.

CSBP-GM-11-012-01, Sodium Cyanide Response to Emergency Situations provides instructions to responding to a safety shower alarm by the control room operator, investigation and first response including first aid.

The Emergency Plan does consider the potential failure scenarios appropriate for its site-specific environmental and operating circumstances. The facility is regulated as a major hazard facility (MHF) and under Western Australian legislation a safety report and safety management system has been developed for the site. The safety report includes detailed assessment of potential major incident scenarios for the site and operation.

The facility operates under vacuum and there is a short 10 m section of pipework prior to the absorbers where HCN is present under normal operating conditions. Pipeline breach would not result in release of HCN and the control room would detect the plant upset and commence controlled shutdown. Other scenarios including release of liquid during loading or storage are covered in *GM-11-013-01 Kwinana Emergency Response Teams* which contains a list of SOPs relating to likely emergency scenarios for the facility.

The Layer of Protection Analysis (LOPA) describes a series of abnormal operating conditions/potential emergency scenarios for the facility and provides detail on possible initiating events and the types of independent protection layers that are in place for each scenario. This document links each scenario to key supporting procedures and management plans.

The emergency procedures do describe specific response actions, as appropriate for the anticipated emergency situations, such as evacuating site personnel and potentially affected communities from the area of exposure.

CSBP-RM-11-010-02 Management of Emergencies, GM-11-013-01 Kwinana Emergency Response Teams and GM-09-110-08 Transport Management Plan for Sodium Cyanide Product, and other supporting procedures, do describe; specific response actions, as appropriate for the anticipated emergency situations, such as evacuating site personnel and potentially affected communities from the area of exposure, control of releases at their source, and containment, assessment, mitigation and future prevention of releases.

CSBP-GM-11-012-03 Sodium Cyanide Response to Emergency Situations and DP-11-012-03 SCP Response to Emergency Situations Involving Personnel do describe; use of cyanide antidotes and first aid measures for cyanide exposure.

Production Practice 5.2

Involve site personnel and stakeholders in the planning process.

AGR is:

☒ in full compliance with

☐ in substantial compliance with

Production Practice 5.2

☐ not in compliance with

AGR is in FULL COMPLIANCE with Production Practice 5.2 requiring the involvement of site personnel and stakeholders in the planning process.

The Facility has involved its workforce and stakeholders in the emergency response planning process. Stakeholders and potentially affected communities are considered through the formal MHF Safety Report that is submitted to the regulator. The safety report includes hazard and operability (HAZOP) studies that involve representatives across operations, technical, environment, safety and projects to identify and evaluate potential major incident scenarios.

More broadly, the facility considers worker input in developing and evaluating health and safety procedures including emergency response via the overarching WesCEF Communications and Consultation process. There is a dedicated Health and Safety Committee made up of representatives from each area of the operation. Monthly meetings occur to discuss a wide range of health and safety topics such as incidents for the month, hygiene monitoring results (number of exposures), changes to standard operating procedures, ongoing safety initiatives, general business and collect feedback from personnel.

The operation is situated within an industrial precinct and is an active member of the Kwinana Industries Mutual Aid (KIMA) group for emergency response. The operation is also a member of the Local Emergency Management Committee (LEMC) run by the local government for the area. Regular meetings providing a forum to communicate and discuss issues that may impact other members and facilities. Cyanide specific response is not anticipated for external responders, but ancillary support and logistics is available if needed.

Potentially affected communities have been made aware of the risks associated with accidental cyanide releases, and there are forums available for ongoing communication. The facility is located within the greater Kwinana industrial area. There are no direct neighbours of a residential nature – the nearest non-industrial community is approximately 2.5-3 km to the east.

CSBP is a member of the Kwinana Industries Public Safety Liaison Group, a mutual aid group formed to provide a forum that is focussed on joint industry emergency response and public safety. Regular meetings are held and meeting minutes verify that information including statistics and emergency alerts, is provided to the public.

Local response agencies such as outside responders and medical facilities have been involved in the emergency planning and response process.

External responders include medical facilities, Department of Fire and Emergency Services (DFES), Western Australia (WA) Police and State Government regulators and Local Councils. DFES would be the primary external responder in the event of a cyanide release scenario.

KIC Member companies provide regular presentations to the public on their safety systems, operations and development works. These informative presentations are conducted at quarterly Community & Industries Forum (CIF) meetings. Representatives from external response agencies are regularly in attendance.

The facility's medical centre does periodically confirm capability with local hospital but as personnel can change regularly has put in place processes to send information relating to exposure incidents with the injured person (IP) so that it is readily available to the those providing treatment. Cyanide antidote kits also travel with the IP to the hospital.

The facility has engaged in regular consultation and communication with stakeholders to assure that the emergency response planning and procedures address current conditions and risks. The Safety Report is subject for formal periodic review with updated report submitted to the regulator. The report

was last revised in 2025. The operation is in the process of a major plant expansion that will change the risk profile of the operation and potential emergency scenarios once completed. The expansion is scheduled for completion late 2026/early 2027. The operation has evaluated these scenarios and is preparing response for future conditions once the upgrades to the facility are commissioned.

CSBP engage in regular consultation via the KIC Mutual Aid meetings and quarterly CIF meetings. Presentations are made to the public on safety systems, operations, and development works.

The operation has responded to a number of potential exposure incidents during the audit period with incident investigations noting initial response actions completed by the operations team were in accordance with procedures. None of the incidents needed higher level emergency response and resources were stood down following initial assessment. Crews are debriefed following incidents and with actions or opportunities shared via toolbox talks.

Production Practice 5.3

Designate appropriate personnel and commit necessary equipment and resources for emergency response.

☒ in full compliance with

AGR is:

☐ in substantial compliance with

Production Practice 5.3

☐ not in compliance with

AGR is in FULL COMPLIANCE with Production Practice 5.3 requiring the designation of appropriate personnel and commit necessary equipment and resources for emergency response.

The operations emergency management system does designate primary and alternate emergency response coordinators who have explicit authority to commit the resources necessary to implement the plan. The WesCEF Incident Management Team (IMT) provides strategic and tactical guidance and direction to combat the incident and is responsible for the development of plans and responses. Roles and responsibilities within the IMT have been clearly defined.

Procedure *CSBP-GM-11-013-01 Emergency Response Teams* provides detail on the composition, identification of ERT members, training, performance standards and duties and responsibilities of the CSBP ERTs. *CSBP-PD-ERS-0003, Emergency Response Training Procedure* defines training requirements and process with the status recorded on the *Emergency Response Team Training Matrix*. Third party certification for competencies are tracked and stored in the LMS.

CSBP is an Accredited Emergency Responder for Sodium Cyanide and Ammonia incidents involving their products both on and off site. The Emergency Services Supervisor is responsible for developing and conducting scenario training and exercises, as well as ensuring adequate Area Wardens are trained and that each area practices the required amount of emergency exercises.

The Emergency Services Support Officer is responsible for ensuring that the ERT has adequate numbers of people competent in the five core areas (respiratory protection, firefighting, HAZMAT, rope rescue and medical). Additionally, the Support Officer ensures that the required regular training for the ERTs is completed.

The on-site and off-site emergency process of the emergency response plan contain necessary information for 24 hour emergency response.

The locations of services and utility resources such as fire alarm and fire control provisions and spill containment systems are documented. Additional emergency response equipment is available through

the Kwinana Industries Mutual Aid (KIMA) group, although not designated or envisaged for direct engagement in cyanide incidents.

Operations personnel check the first aid equipment weekly as part of the routine Hazard and Housekeeping self-audit system. Stock replenishment is handled via the on-site medical facility/personnel. An inspection of the facility found equipment to be available and in serviceable condition and a full set of completed inspection records was available for review.

It is the responsibility of the Incident Controller to contact external emergency services when required. On-site medical personnel have contacted the two nearby hospitals to confirm they have retained their capability to treat cyanide exposure cases.

External responders, medical facilities and other outside entities have been advised of their roles and are aware of aid requirements during an emergency response. DFES would be the primary external responder in the event of a cyanide release scenario, and the Department has been involved in major response exercise drills in the past.

Due to the nature of the facility, and specialised training requirements of qualified external responders, emergency response is largely self-contained and or limited to DFES, HAZMAT or other specialised agencies. Outside responders have been involved in HAZMAT response planning exercises but not cyanide specific drills within the audit period.

KIC Member companies provide regular presentations to the public on their safety systems, operations and development works. These informative presentations are conducted at quarterly CIF meetings.

Production Practice 5.4

Develop procedures for internal and external emergency notification and reporting.

☒ in full compliance with

AGR is:

☐ in substantial compliance with

Production Practice 5.4

☐ not in compliance with

AGR is in FULL COMPLIANCE with Production Practice 5.4 requiring the development of procedures for internal and external emergency notification and reporting.

CSBP-RM-11-010-02 Management of Emergencies contains the procedural, contact and outside responder information required. It identifies external emergency responders and their roles, as well as the notification of authorities, the plan refers to the process *WCEF-PD-CMP-000-26 Notification of Incidents to External Authorities – Western Australia* which describes the procedure for making contact. CSBP maintains a list of contacts for use during emergencies. The contact names and numbers are checked and updated in the documentation system and replaced in the Emergency Control Centre at least every twelve months by the Emergency Services Supervisor or following organisational changes.

CSBP-RM-11-010-02 Management of Emergencies contains the procedure for notifying potentially affected neighbours of an incident. CSBP Kwinana is member of the Kwinana Industries Mutual Aid (KIMA) group. Notification to neighbours is done via the KIMA two-way radio system. CSBP has a number of strategically placed sirens across site to reduce the risk of sirens or notifications not being heard in the event of an emergency.

CSBP-RM-11-010-02 Management of Emergencies addresses media enquiries and there is a structured communications team procedure in the event necessitate activation of the crisis management team (CMT). During an emergency no information is to be released about the emergency to any off-site caller without authorisation by the Corporate Communications Manager or Incident Controller. There is a Response to Media or other Enquiries During Emergencies process that must be followed.

The operation has a written procedure for notifying ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. The process is documented in *WCEF-PD-CMP-000-26 Notification of Incidents to External Authorities – Western Australia* for non-statutory reporting that includes notifications to the ICMI. The operation has provided the ICMI with information on all cyanide or potentially cyanide related incidents that were reported during the audit period.

Production Practice 5.5

Incorporate remediation measures and monitoring elements into response plans and account for the additional hazards of using cyanide treatment chemicals.

☒ in full compliance with

AGR is: ☐ in substantial compliance with

Production Practice 5.5

☐ not in compliance with

AGR is in FULL COMPLIANCE with Production Practice 5.5 requiring the incorporation of remediation measures and monitoring elements into response plans and account for the additional hazards of using cyanide treatment chemicals.

The Emergency Plan does describe specific, appropriate remediation measures, 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, and provision of an alternate drinking water supply, as appropriate.

CSBP-GM-11-013-01 Kwinana Emergency Response Teams contains a list of SOPs relating to likely emergency scenarios for the facility. These include specific and appropriate remediation measures 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.

The SOPs requiring monitoring for toxic gases to occur whilst steps to neutralise the spill are implemented are in place. They specify what treatment chemical to use and provide a guide for determining the correct quantity to apply. The end point of remediation activities is a return to baseline conditions. The SOPs details the neutralisation techniques, neutralising treatment chemicals (including that "generally, hypochlorite, ferrous sulphate and hydrogen peroxide must not be allowed to enter any natural body of surface or ground water"), and locations of neutralising at AGR Sodium Cyanide production facility in Kwinana.

Neutralisation procedures and neutralisation scenarios sections in the procedure address the potential need for environmental monitoring. Sampling and testing methodologies are provided for a number of scenarios. Additional information is provided in *CSBP-GM-09-110-08 Transport Management Plan* for Sodium Cyanide Product.

The provision of an alternate drinking water source is not required based on the nature of the likely emergency scenarios.

The facility does generally prohibit the use of chemicals to treat cyanide that has been released to surface water. SOPs that have reference to the use of chemical to treat cyanide include the statement *“Generally Sodium Hypochlorite, Ferrous Sulphate MUST NOT be allowed to enter any natural body of surface or ground water.”*

Were a release to occur at the facility, appropriate capture and containment measures are in place and monitoring would occur as per standard operating procedures, such as CSBP-GM-13-060-23 Sodium Cyanide Process Wastewater Management Plan. Emergency procedures, includes further information on the emergency and wastewater management system and monitoring and testing requirements prior to disposal. The SOP related to potential release into water course notes that *“Development and implementation of any treatment or remediation actions needs to be done in consultation with a suitably qualified environmental professional, due to the complexities of surface water, groundwater, implementation approvals and regulatory risk that need to be managed.”*

Production Practice 5.6

Periodically evaluate response procedures and capabilities and revise them as needed.

☒ in full compliance with

AGR is:

☐ in substantial compliance with

Production Practice 5.6

☐ not in compliance with

AGR is in FULL COMPLIANCE with Production Practice 5.5 requiring the periodic evaluation of response procedures and capabilities and revise them as needed.

The operations emergency management system does contain provisions for periodically reviewing and evaluating the plan's adequacy and they are being implemented. *CSBP-RM-11-010-02 Management of Emergencies* provides a review frequency of every two years to ensure relevance and completeness. CSBP's electronic document management system is used to ensure when the plan is updated, reviewed or modified, all copies are automatically updated and all those on the distribution list receive notification. The Management of Emergencies plan was last reviewed and modified on 1 November 2023. A review of support system documentation confirms that the two-yearly review cycle is typically complied with.

The facility is regulated as a major hazard facility (MHF) and under Western Australian legislation a safety report and safety management system has been developed for the site. The safety report includes detailed assessment of potential major incident scenarios for the site and operation. The Safety Report is subject for formal periodic review with updated report submitted to the regulator. The report was last revised in 2025. The operation is in the process of a major plant expansion that will change the risk profile of the operation and potential emergency scenarios once completed.

Mock emergency drills are conducted, and they are used as an effective part of the Emergency Plan evaluation process. Drill scenarios are varied and address both cyanide release and exposure type events. The operation has implemented a tiered approach to mock exercises with drills designed for the CMT, IMT and ERT focusing on their roles in the response process.

The organisation has completed a number of cyanide and non-cyanide hazmat related exercises over the audit period that have involved participation of the ERT and IMT. In addition to these mock exercises the operation has responded to a number of worker exposure alarms in accordance with procedures. None of the reported incidents involve higher level emergency actions and the team was stood down following evaluation of the incident.

The Emergency Services Support Officer coordinates the regularly practicing emergency response skills for emergency response team members with training occurring fortnightly. The training is a combination of theory and practical skills across the core response competencies and across the various products manufactured at the facility including sodium cyanide. Evidence of training was provided for review and personnel interviewed described the training processes and activities undertaken.

The facility has provisions to evaluate plans and procedures after an emergency that required implementation of them accordingly, and for revising the plans and procedures as necessary. During the audit period there were no cyanide releases or exposure incidents on the plant site that triggered the deployment of the emergency response team or incident management team.

The operation has a structured debrief process following an incident or mock exercises referred to as a post incident analysis (PIA). The process involves the personnel involved in the drills and covers the scenario, objectives, timeline, what worked well, improvement opportunities, recognition, factors and actions. Mock drill reports were provided for review with minor opportunities for improvement identified. The emergency response procedures and processes have been reviewed by the operation during the audit period with no material changes made to them.

At the time of the audit the operation has initiated a major plant expansion that will change the risk profile of the plant which is due for completion late 2026/early 2027. Updates to the MHF safety report including evaluation on major incident scenarios have been progressed and submitted to the regulator for approval. These will trigger review of the emergency response processes to be evaluated in the next audit cycle.

