



**REPORT**

**ICMC RECERTIFICATION  
CORRECTIVE ACTION IMPLEMENTATION REPORT**  
*La India Mine, Sonora, México*

Submitted to:

**International Cyanide Management Institute (ICMI)**

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Submitted by:

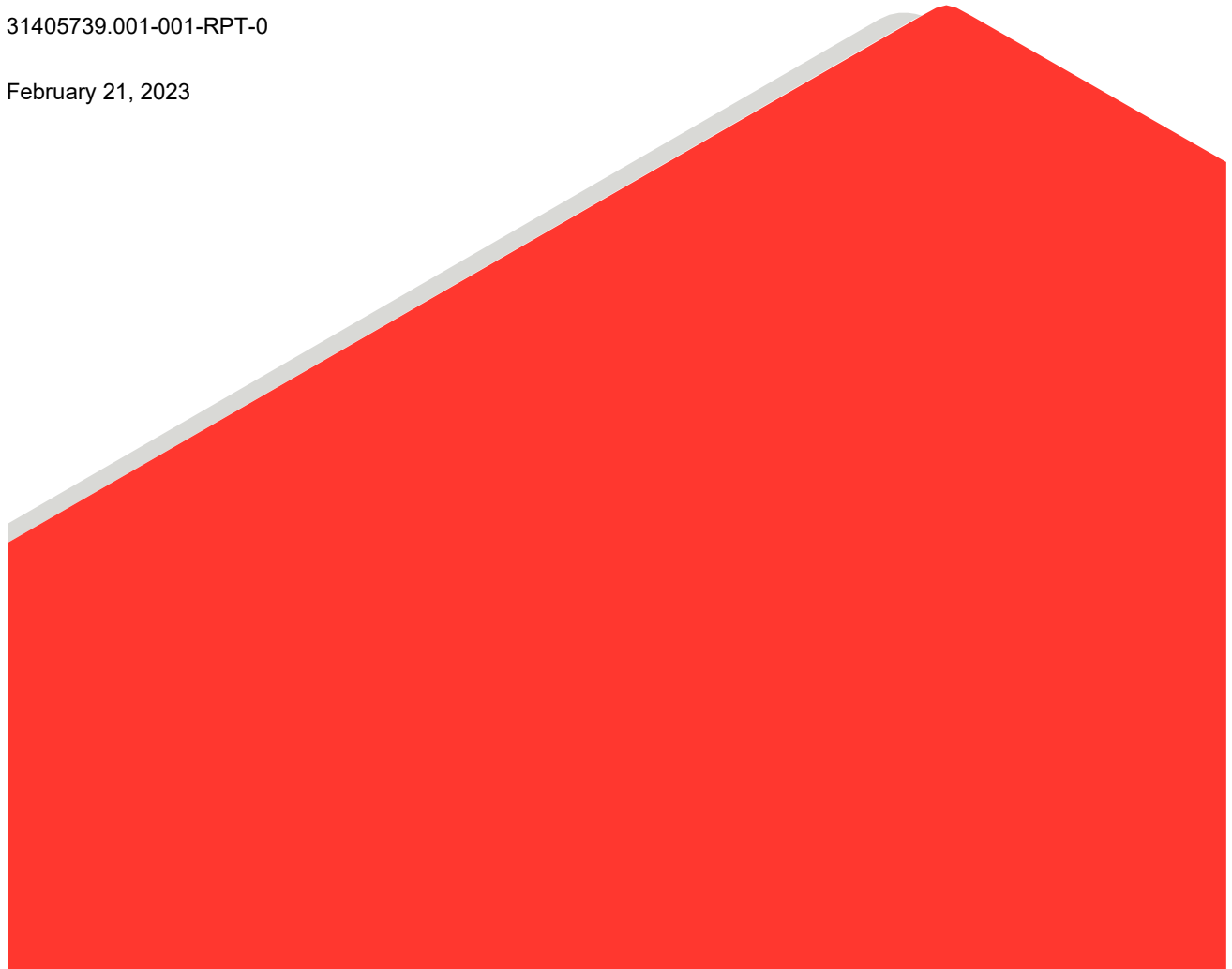
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## 1.0 INTRODUCTION

The Agnico Eagle (Agnico Eagle) La India Mine (La India) was found to be in substantial compliance with the International Cyanide Management Code for the Manufacture, Transport, and use of Cyanide in the Production of Gold (the Code) on March 17, 2022. Accordingly, La India developed a Corrective Action Plan (CAP) to address the identified deficiencies (ICMC Recertification Corrective Action Plan La India Mine, March 10, 2022). This report confirms the successful implementation of the CAP resulting in the operation being fully compliant with the Code.

## 2.0 VERIFICATION OF CORRECTIVE ACTION PLAN IMPLEMENTATION

A review of the evidence presented by La India, supporting the full implementation of the CAP was conducted by Golder Associates USA Inc., now WSP USA Inc., in February 2023. The results are summarized in Table 1.

### 2.1 Table 1: CAP Implementation Verification

<b>Standard of Practice 4.1</b>	<i>Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventative maintenance procedures.</i>	
<b>Question 4.1.2</b>	<i>Does the operation have plans or procedures that identify and account for the assumptions and parameters on which the facility design was based and any applicable regulatory requirements as necessary to prevent or control cyanide releases and exposures consistent with applicable requirements?</i>	
Deficiency summary relation to Question 4.1.2.	Deficiency associated with inadequate design for managing runoff that resulted in flooding of a low area adjacent to the Heap Leach Facility (HLF) Phase 1. Damage to the toe berm for the HLF Phase 1 in the area where runoff ponded. The damage to the toe of the Phase 1 HLF was localized and did not appear to constitute a risk of overall slope failure.	
<b>Corrective Actions</b>	<b>Evidence Observed</b>	
<ul style="list-style-type: none"> <li>■ Construct the drainage improvements.</li> <li>■ Schedule inspection and maintenance for the drainage improvements at a frequency sufficient to ensure their proper function.</li> <li>■ Inspect and maintain the drainage improvements.</li> </ul>	<p>The following evidence was reviewed to verify the construction of the drainage improvements as well as the development and implementation of an inspection and maintenance program for the drainage areas in the HLF.</p> <ul style="list-style-type: none"> <li>■ A PowerPoint presentation (file name: Trabajos 5.5.pptx) documenting the drainage improvements conducted in the Phase 1 and Phase 3 areas of the HLF to divert stormwater to a new stormwater collection pond (referred as Carcamo 5.5). These improvements included the following:                             <ul style="list-style-type: none"> <li>■ The regrading of the pad slopes and access roads</li> <li>■ Improvements to existing diversions</li> <li>■ The construction of new diversions and diversion berms</li> <li>■ The construction of a stormwater collection pond with a sump and corresponding pump</li> </ul> </li> </ul>	

	<ul style="list-style-type: none"><li>■ The installation of a pipeline to discharge the water collected in the collection pond to the excess pond.  The PowerPoint presentation included a map of the improvements showing the direction of the stormwater diversion flows before and after the improvements as well as a map showing the location for the diversions, diversion berms, the collection pond and the alignment of the pipeline to the excess pond.</li><li>■ A PDF file with photographs showing the construction of the stormwater collection pond and the pipeline to the excess pond as well as the improvements made to the diversion systems (file: Carcamo OVL5.5.pdf)</li><li>■ A 2022 and 2023 inspection and maintenance program for the drainage areas of the HLF, the collection pond and pipeline system between the collection pond and the excess pond (file name: Programa General Anual de Inspeccion y Mantenimiento del Proyecto 5.5.xls). The program includes a schedule for the inspection and maintenance of the civil, mechanical, electrical and operating aspects of the drainage facilities and covers the diversions, HLF slopes, collection pond, pond pumping system, pipeline system and others. The recommended inspection frequency varies from monthly to twice a year, which it is a frequency sufficient to ensure the proper function of the drainage system. The program also describes the activities to be conducted as part of the inspections and maintenance.</li><li>■ Examples of completed inspection and maintenance records for the drainage improvements were provided to verify implementation of the inspection and maintenance program. Records reviewed included:<ul style="list-style-type: none"><li>■ October 20, 2022 inspection and maintenance records for the collection pond sump system.</li><li>■ October 20, 2022 inspection and maintenance records for the pipeline system between the collection pond and the excess pond.</li></ul></li></ul>
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	<ul style="list-style-type: none"> <li>▪ October 20, 2022, and December 11, 2022, inspection and maintenance records for the diversions, HLF slopes, berms, and areas around the collection pond.</li> </ul>
<p><b>Compliance Status</b></p>	
<ul style="list-style-type: none"> <li>▪ La India has completed this corrective action and is Fully Compliant with this question and Standard of Practice.</li> </ul>	
<p><b>Standard of Practice 4.7</b></p>	<p><i>Provide spill prevention or containment measures for process tanks and pipelines.</i></p>
<p><b>Question 4.7.5</b></p>	<p><i>Are spill prevention or containment measures provided for all cyanide process solution pipelines to collect leaks and prevent releases to the environment?</i></p>
<p>Deficiency summary relation to Question 4.7.5.</p>	<ul style="list-style-type: none"> <li>▪ The pipeline between the transfer pond and the pregnant pond for the Phase 3 HLF did not have secondary containment.</li> </ul>
<p><b>Corrective Actions</b></p>	<p><b>Evidence Observed</b></p>
<ul style="list-style-type: none"> <li>▪ Install an outer pipe as secondary containment along the entire length of the pipeline between the transfer pond and the pregnant pond, including any buried portions near the transfer pond.</li> </ul>	<p>The following evidence was reviewed to verify the installation of an outer pipe as secondary containment along the entire length of the pipeline between the transfer pond and the pregnant pond, including any buried portions.</p> <ul style="list-style-type: none"> <li>▪ Photographs showing the installation of an outer 30-inch diameter high-density polyethylene (HDPE) pipe to create a pipe-in-pipe configuration as secondary containment for the entire length of the 24-inch HDPE pipeline system between the transfer pond and the pregnant pond for the Phase 3 HLF. The photographs also show the installation of this outer pipe in the buried portions of the pipeline system. The following files containing the photographs were reviewed:             <ul style="list-style-type: none"> <li>• PDF file: Cronologia de instalacion Tuberia de recubrimiento fase III.pdf.</li> <li>• June 13, 2022 email from La India with a description of the outer pipe installed and additional photographs of the installation of this pipe in the areas of the transfer pond and the pregnant pond.</li> </ul> </li> </ul>
<p><b>Compliance Status</b></p>	
<ul style="list-style-type: none"> <li>▪ La India has completed this corrective action and is Fully Compliant with this question and Standard of Practice.</li> </ul>	

## STATEMENT OF COMPLIANCE

Based on the evidence observed, I am satisfied that La India Mine has fully implemented the CAP submitted to the ICMI and consequently the operation is fully compliant with the Code. Should you require any additional information, please do not hesitate to contact me.

**WSP USA Inc.**



Ivon Aguinaga  
*Lead Auditor and Mining Technical Specialist*

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