AUGUST 2025

INTERNATIONAL CYANIDE MANAGEMENT CODE RECERTIFICATION AUDIT

Orica Australia Pty Ltd - Iaverton Warehouse Facility
Production Facility Recertification Audit - Summary Audit Report

Prepared for Raghu Pathireddy
Orica Australia Pty Ltd
5 August 2025
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Submitted to:

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ENPOINT
Environmental Asset Management

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CONTENTS

1 INTRODUCTION

1.1 Operational Information

Name of Production Facility	Laverton Warehouse Facility
Name of Facility Owner	Toll Global Logistics
Name of Facility Operator	Toll Global Logistics
Name of Responsible Manager	Raghu Pathireddy, Asset Management Lead, Orica
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1.2 Description of Operations

1.2.1 Orica Australia Pty Ltd

Orica is an Australian-owned, publicly listed company with global operations. Orica is managed as discrete business units that produce a wide variety of products and services. The Mining Chemicals unit is based in Australia and exports products to Asia, Africa and the Americas, as well as supplying the local Australian industry. This unit's main product is sodium cyanide, which is manufactured at Orica's Yarwun Production Facility (Yarwun Facility) in Queensland, Australia.

1.2.2 Yarwun Production Facility

Orica's Yarwun Facility, which is located approximately 8 km by road from Gladstone, Queensland, commenced operations in 1989 and is engaged in the manufacture of cyanide (both solid and liquid forms), nitric acid ammonium nitrate and ammonium nitrate emulsion. The Orica Yarwun production facility was originally certified as compliant with the Code in 2006 and was last recertified on 31 October 2023.

1.2.3 Toll Laverton Facility

The TGL Laverton Facility at 180 Fitzgerald Road, Laverton North, is a dangerous goods warehousing and distribution facility. The primary function of the Facility is the storage and handling of packaged and intermediate bulk chemical products in eight on-site warehouses and in a number of external storage locations. A proportion of the products stored and handled on site are dangerous goods, with food grade materials and non-dangerous goods also being stored and handled on the site.

The Laverton Facility provides interim storage of cyanide under a contract arrangement for Orica. Shipping containers arriving at the Facility from Orica's Yarwun Facility are destuffed and dehired. The cyanide intermediate bilk containers (IBC) are transferred temporarily from the arrival containers to site owned containers. Prior to leaving the facility, the IBCs are repacked in containers for export. No cyanide in IBCs is stored outside of a container. Sparge isocontainers are stored in a dedicated bunded area (Area 7).

Cyanide is only stored outside in either isotainers or in IBCs within sea containers. There is no manufacture or production of cyanide product at this facility.

1.3 Auditor Finding and Attestation

Orica's Laverton Warehouse Facility is:	☒ **in full compliance with**	**The International Cyanide Management Code**
	☐ in substantial compliance with	
	☐ not in compliance with	

Audit Company	Enpoint
Audit Team Leader	Mike Woods (Exemplar Global – 113792)
Email	mike.woods@enpoint.com.au

This operation has not experienced any compliance issues during the previous three-year audit cycle. No cyanide exposure incidents were noted as occurring during the audit period.

Name and Signatures of Auditors:

Name	Position	Signature	Date
Mike Woods	Lead Auditor and Transport Technical Specialist		5 August 2025

1.4 Dates of Audit

The Audit Team was undertaken by Mike Woods of Enpoint, an ICMI pre-certified Lead Auditor. The field component of the audit was completed on 21 February 2025.

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Verification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Production Operations and using standard and accepted practices for health, safety and environmental audits.

2 PRINCIPLES

2.1 Principle 1 – Operations

Design, construct and operate cyanide production facilities to prevent releases of cyanide

2.1.1 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**	
Orica is:	☐ in substantial compliance with	**Production Practice 1.1**
	☐ not in compliance with	

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

The TGL Laverton Facility is a licenced major hazard facility with a detailed safety case describing the operations and controls for the storage and handling of dangerous goods at the facility. The construction of the facility has been evaluated in previous audits and there have been no changes to the infrastructure used to store cyanide at the facility since the last audit.

Boxed cyanide product is moved between shipping containers for storage at the facility in the designated external storage area in sea containers (Area 6). Sparge isocontainers are stored on a concrete surface in Area 7. An inspection of these areas was undertaken during the audit and the pavement materials were observed to be in serviceable condition with evidence of maintenance and repairs having been undertaken.

There have been no physical changes to the facility since the previous audit.

The materials of the hard stand area are compatible with the processes employed at the facility. Forklifts are used to unload and repack IBCs in sea containers. The facility utilises a combi lift straddle to load onto, or unload containers from, transport vehicles. These activities are undertaken on the hard stand areas within the designated areas for cyanide product storage.

The facility provides external storage in sea containers of boxed solid cyanide product manufactured at Orica's Yarwun production facility. There is also intermittent storage of a sparge isocontainer (containing solid product). There are no production facilities or equipment present at the site. Therefore, the requirement for automatic systems or interlocks is not applicable to this facility.

Solid sodium cyanide is stored within IBCs within sea containers on a concrete paved surface in Area 6 and sparge isocontainers with solid product are placed in Area 7. The facility does not have cyanide process or storage vessels, and the requirements related to level indicators and high-level alarms is not applicable to this facility.

There are no process or storage tanks present at the facility and accordingly, the requirement for secondary containments for these tanks is not applicable. There are no cyanide pipelines present at the facility.

Solid sodium cyanide is stored within IBCs packaged at Orica's production facility in Yarwun, Queensland or within sparge isocontainers that are filled and sealed at Orica's production facility. The

storage facility has full perimeter security fencing with CCTV and access control systems for personnel and vehicle entry.

The product is stored in designated external hardstand areas on the eastern side of the facility segregated from incompatible materials. The site is a MHF and access to the public is prohibited. TGL have a calibrated HCN monitor to check HCN levels in the event of an incident.

2.1.2 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**	
Orica is:	☐ in substantial compliance with	**Production Practice 1.2**
	☐ not in compliance with	

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

The facility does have plans and procedures that describe the practices necessary for its safe and environmentally sound operation. There are a series of procedures that detail the process for unpacking and packing of IBCs in sea containers including controls for weather conditions (i.e. no transfer during or impending rain events) and the operation of the materials handling equipment (forklifts). There is a procedure outlining the monitoring of hydrogen cyanide gas (HCN) for the transfer activity.

The procedures cover the extent of cyanide handing at the facility. Cyanide remains sealed within the product packaging sent from the manufacturer. At no time is the cyanide product handled or mixed at the site.

The operation undertakes HCN gas monitoring during destuffing activities. A multigas detector with a HCN sensor is used with the unit set to alarm at 5 ppm and 10 ppm. Should the unit alarm then the procedure is to evacuate the immediate area and raise the alarm and isolate the area to prevent unauthorised access. This would be considered an incident and involve activation of emergency response processes.

The emergency plan does consider potential scenarios applicable to the operations undertaken at the facility. The plan contains procedural information for responding to release of HCN has and releases during loading and unloading (i.e. loss of containment from an incident). There were no incidents related to cyanide at the facility during the audit period.

The facility does have a management of change (MOC) procedure that outlines the assessment of change. The scope of the procedure covers where there is the introduction of something new, or a change that modifies the level of HSE risk exposure and include changes or alterations to buildings, plant, legislative changes, organisation changes and new or altered activities involving dangerous goods.

There have been no changes to the physical facilities at the operation. Changes relate to cyanide activities at the facility include the new combi lift and the recent decision to no longer store cyanide antidote kits at the site due to impracticalities in its administration. Evidence of the operation following its change management processes were available for review.

The standard operating procedures include notes on the document revisions outlining the changes that have been made and when the revision was made.

The facility handles packaged solid cyanide manufactured at another facility. At no time is the cyanide product handled or mixed at the site. Accordingly, maintenance activities applicable to cyanide operations at the facility relate to mobile plant (combi lift and forklifts) use to handle sea containers/isocontainers and IBCs respectively. There is established service intervals from this equipment and the servicing is completed by third party providers. Service records for the equipment used to handle the packaged cyanide were available for review.

There are processes for routine visual inspections of the facility completed by operators and management as part of the HSE system together with hazard reporting. There is a reactive maintenance program for the pavement on which the containers are stored where repairs are undertaken on an as needs basis. Evidence of recent repairs was evident during the site visit.

The facility does not produce or directly handle cyanide and accordingly there are no process parameters to be monitored. There are no discharges of cyanide solution or cyanide contaminated water that could collected in secondary containment areas under normal operating conditions.

There are no cyanide contaminated materials or cyanide waste under normal operating conditions. Cyanide impacted materials maybe generated in the event of loss of containment incident which is managed as an emergency.

The facility does not produce or package cyanide. The cyanide product stored at the facility is manufactured at Orica's ICMC fully certified facility in Yarwun, Queensland. The facility does not change or modify the packaging of the product. Dangerous Goods placarding (DG Class Diamond and UN Number) is applied to the shipping containers as needed for compliance with Australian dangerous goods transport.

2.1.3 Production Practice 1.3

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

	☒ **in full compliance with**	
Orica is:	☐ in substantial compliance with	**Production Practice 1.3**
	☐ not in compliance with	

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

The requirements for inspections of tanks, valves, pipelines and containments are not applicable to this operation as the facility does not produce or directly handle cyanide product.

The facility is a storage operation that moves cyanide IBCs between shipping containers for storage and onward transport and also stores sparge isocontainers. The containers and isocontainers are stored in designated external areas on pavement or concrete. There is a general site inspection process and reactive repair process for surfaces with evidence of repairs noted during the site inspection

2.2 Principle 2 – Worker Safety

Protect workers' health and safety from exposure to cyanide.

2.2.1 Production Practice 2.1

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

	☒ **in full compliance with**	
Orica is:	☐ in substantial compliance with	**Production Practice 2.1**
	☐ not in compliance with	

The operation 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 procedures to minimise work exposure during normal operations, emergency or non-routine operations and maintenance. The facility is regulated as a Major Hazard Facility (MHF) which necessitates the development of a Safety Case and safety management system that provides the basis for operation of the facility.

Specific procedures have been developed and implemented for the transfer of cyanide IBCs between shipping containers. The facility does not produce or handle raw materials or unpackaged cyanide. The procedures address the following aspects:

- Unpacking of container and loading of containers
- Monitoring for HCN
- Equipment inspections
- Use of personal protective equipment (PPE)
- Emergency procedures

The facility does solicit and consider worker input in developing and evaluating health and safety procedures. There is a health and safety committee that meets regularly with documented minutes. Part of the standing agenda items includes changes to health and safety procedures. In addition to this forum there is a formal management of change process that drives team-based risk assessments to be completed for safety and environmental related changes. A recent example was provided relating to the change in cyanide antidote arrangements and this assessment included consultation with workers.

The facility has identified areas and activities where workers may be exposed to HCN gas exceeding 10 ppm. The opening of sea containers has been identified by the site as the activity with potential for worker exposure to HCN. The site has implemented procedures for the opening and venting of containers including monitoring for HCN levels prior to destuffing the containers.

The other activity identified at the site with potential for HCN exposure is responding to loss of containment incident. Procedures are in place and personal protective equipment (PPE) is required for personnel responding to spills.

The facility does use monitoring devices with associated alarms to confirm that controls are adequate to limit worker exposure to HCN gas. The facility has a Draeger X-am 8000 multi gas detector with a HCN sensor. The alarms are set to activate at 5 ppm and 10 ppm. Personnel level the immediate vicinity where the first alarm level is triggered. This would indicate an abnormal operating condition or potential emergency triggering further assessment with PPE control implemented.

The monitor is maintained, tested and calibrated as recommended by the manufacture and records of calibrations are retained. Calibration records were observed for the monitor.

The facility has provisions to for workers to communicate with other personnel for assistance, help or aid as necessary. There is an intrinsically safe radio communication system in operation. Mobile phones are not allowed within the warehousing area.

There is a corporate level fitness for work process that includes a pre-employment medical to assess the workers capability and check that they are medically fit to undertake the inherent duties of their role. There is also a drug and alcohol testing procedure for random and for cause basis with a minimum of one per annum. The testing is completed by accredited third party providers

The facility does not have a clothing change policy or procedure on the basis that cyanide is fully contained within IBCs or iso-containers and contact with cyanide would not occur under normal operating circumstances. A clothing change policy is not applicable to the facility.

There are additional PPE requirements for responding to abnormal operating conditions and spill that adequately address the potential for cyanide contamination of clothing in these circumstances.

Warning signs advising workers that cyanide is present are displayed at the site with cyanide stored in designated areas within container or isocontainers with UN numbers and dangerous goods placards. The IBCs also have warning labels attached.

The site is a designated MHF under Victorian legislation as it is a dangerous goods storage Facility. Personnel are prohibited from smoking, eating and drinking, and having open flames within the site, including the facilities used to warehouse Orica's cyanide product. Signage is displayed at the main gate and at the access point to the site office to communicate these prohibitions. These messages are reinforced in the Site Induction and in the training materials for the various warehouses.

2.2.2 Production Practice 2.2

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

	☒ **in full compliance with**	
Orica is:	☐ in substantial compliance with	**Production Practice 2.2**
	☐ not in compliance with	

The facility 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.

There is a specific emergency response plan written for the facility that includes response action to cyanide exposures. The plan outlines response times and responsibilities (Section 14), first aid response for cyanide exposures (Section 15.4) and a detailed pre-incident plan for sodium cyanide. This information is supplemented by the Orica Emergency Response Guide.

There are integrated showers and eyewash stations located strategically throughout the facility. The nearest showers and eyewash stations to the cyanide storage locations were tested and found to be in operable condition. There are non-acidic fire extinguishers located throughout the plant and an inspection of the compliance tags attached to the extinguishers showed they has been inspected and services on a regular basis.

Third party inspection records for the extinguishers and fire systems installed at the site were available for review.

The facility has oxygen, a resuscitator, antidote and a means of communication or emergency notification readily available for use in the plant. There is a site wide evacuation alarm and where the

alarm sounds for longer than 20 seconds, personnel evacuate to one of the three designated muster points at the site. There is a site two-way radio system that is used in the event of an emergency.

Cyanide antidote kits were stored at the site during the audit period. Given the low risk of cyanide exposure from the activities at this operation, the impracticalities of using antidotes stored by the facility and the evaluation process undertaken, the facility is in the process of changing this practice. The organisation followed is change management processes including completion of a team-based risk assessment. The facility has confirmed that hospitals in proximity of the operation maintain their own stocks of the antidote kit.

There is a first aid remove with medical oxygen available, along with defibrillator and resuscitation equipment.

The facility does inspect its first aid equipment regularly to ensure that it is available when needed. An inspection of the first aid equipment found it to be present and in serviceable condition. Compliance tags were in place for the medical oxygen equipment which is inspected and maintained by third party provider.

Safety Data Sheets, first aid procedure and other informational materials on cyanide a provided in the official language (English) and available to workers at the site. The Globally Harmonised System (GHS) for classification and labelling chemicals has been implemented at the site with pictograms provided at the storage locations.

Cyanide is present at the site in the form of solid sodium cyanide within IBCs in sea containers or within Isocontainers. There are no process tanks or containers with sodium cyanide solution present.

The facility provides warehousing services for cyanide packaged in IBCs, accordingly there is not a clothing change policy or formalised decontamination procedure applicable for the site for normal operations. Information is provided to the workforce through the induction training including hygiene practices for working around chemicals, raising the alarm if you have come into contact with chemicals and the use of safety showers. These measures are applicable to cyanide and the other chemicals stored at the site.

The facility has its own on-site capability to provide first aid, but not higher-level medical assistance to workers exposed to cyanide. The site has a number of first aid responders that are based at the facility and a review of training certificates confirmed onsite capability. The Facility has first aid equipment located at the main office.

There are first aid officers that are trained to provide first response in the event of an emergency. In the event that medical treatment is required, the casualty would be transported to obtain qualified medical treatment at a nearby hospital.

The facility has developed a procedure to transport exposed workers to locally qualified, off-site medical facilities. In the event that transport of exposed workers to offsite medical facilities is needed, the transport would be undertaken by the Victorian Ambulance. The Victorian Ambulance Service is a dedicated provider that provides services across the community and is linked to Australia's national 000 telephone emergency services phone number.

The facility has alerted local hospitals, clinics, etc. of the potential need to treat patients for cyanide exposure, and the Facility is confident that the medical provider has adequate, qualified staff, equipment and expertise to respond to cyanide exposures. The nearest hospital is the Footscray Hospital, which is a major accident and emergency department. The hospital has a recent major upgrade with the new emergency department including five resus bays, six fast-track bays and more than 50 acute and short stay beds.

The availability of offsite medical resources was reviewed through the cyanide antidote risk assessment and management of change process completed in 2025 and the facility is confident that there is adequate staff, equipment and expertise to respond.

Procedures are in place to investigate and evaluate cyanide exposure incidents to assess 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. TGL has an Incident Management System, which is a computerised database for collection of incident related data.

Series incidents, which for this site would include those involving cyanide, are subject to route cause assessment and documented investigation reports. Incident involving cyanide are also reported to Orica who may undertake their own investigation of the circumstances. The investigation process does include evaluation of training, equipment, operating environment and procedures to evaluate if they were followed and effective.

There were no cyanide exposure or environmental release incidents during the audit period.

2.3 Principle 3 – Monitoring

Ensure that process controls are protective of the environment.

2.3.1 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**	
Orica is:	☐ in substantial compliance with	**Production Practice 3.1**
	☐ not in compliance with	

The operation is in FULL COMPLIANCE with Production Practice 3.1 requiring the conduct of environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.

The facility does not monitor for cyanide in discharges to surface water or in surface water upgradient and downgradient of the site as there are no discharges from the facility that contain cyanide. Solid sodium cyanide is stored within sealed containers, either IBCs within shipping containers or within isocontainers. There is no manufacturing or processing of cyanide on the site

The facility does not have a direct discharge to surface water. There are no indirect discharges to surface water at the site.

The Victorian Environmental Protection Authority have not identified groundwater contamination by cyanide (or other chemicals) as an issue for the site. Accordingly, groundwater monitoring is not applicable to the facility.

The facility does not produce cyanide or directly handle cyanide product. The Facility has developed and submitted a Safety Case to the regulator under major hazard legislation and HCN generation was assessed in this process and was not considered a risk unless in the event of an incident. This assessment concluded that HCN was not a risk too off-site personnel or community and would be a localised issue on the premises.

The facility does have a multigas meter available on site should HCN monitoring or assessment be needed in the event of damaged packaging or emergency situation.

The facility does not utilise monitoring devices under normal conditions due to the nature of the task and conditions of storage with the exception as multigas meter when opening the shipping container.

2.4 Principle 4 – Training

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

2.4.1 Production Practice 4.1

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

	☒ **in full compliance with**	
Orica is:	☐ in substantial compliance with	**Production Practice 4.1**
	☐ not in compliance with	

The facility is in FULL COMPLIANCE with Production Practice 1.4 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 through induction and refresher training. The training material covers the physical properties for cyanide, hazards, exposure pathways, exposure symptoms and medical treatment and safe handling practices. The cyanide awareness presentation includes a written knowledge assessment to confirm workers have completed and understood the training. Refresher training is provided on a three-year schedule. Interviews and a review of training records confirmed that training was provided.

The facility does trains workers in the use of PPE and when and where this equipment is required. Site training materials introduce the various items of personal protective equipment that are used and provided instruction on the inspection, doning and doffing of the equipment.

Additional PPE is not required for the normal cyanide related tasks at the site. Training in the use of PPE for spill or emergency response activities is provided. The site has self-contained breathing apparatus (SCBA) available and key personnel are trained in the use of this equipment by accredited training providers and the national competency framework. Records of training were available for review.

The facility trains its workers to perform their normal production tasks with minimum risk to worker health and safety and in a manner that prevents unplanned cyanide releases. The training process includes the site induction programme that provides the overview of site safety rules and requirements. Workers are then trained in the task level operating procedure and equipment to be used. For the cyanide related tasks at this site, the equipment is mobile plant (Forklifts and Combilift). To operate these types of equipment in Australia, the individual needs to hold a High-Risk-Work-Licence (HRWL) that is issued by an accredited training provided that confirms the competency of the operator. The site also undertakes an onsite verification to confirm the operator can use the equipment before being allowed to use it.

Employees are trained prior to allowing them to work with cyanide. This is completed through the site induction process including cyanide awareness training and the completion of task level operating procedure verification. This need to be completed before a worker is permitted to undertake cyanide related activities.

Refresher training is provided on normal production tasks. The site complete period verification of competency (VOC) on mobile plant and checks on worker understanding of task procedures. VOC assessment records for forklift operators were inspected and copies of task procedure reviews were also checked.

The training elements necessary for the unloading, storage and loading of cyanide IBCs is covered through training for the operation of forklifts, which is part of nationally recognised industry certification, and through onsite procedures and cyanide awareness.

Appropriately qualified personnel provide the training. Induction training is provided by the HSE advisor who is familiar with the site operations and associated hazards. Training on forklift operation and use is provided by nationally recognised training organisations in accordance with the Australian Qualifications framework. Organisations providing certified training meet training qualifications requirements. This is supplemented by site rules and on the job training and direction, which is provided by the site supervisors.

The facility evaluates the effectiveness of cyanide training by testing and observation. The cyanide awareness training module includes a knowledge assessment. The practical elements of cyanide handling (loading and unloading IBCs in shipping containers) using mobile equipment is evaluate with a combination of testing and observation by the site and third-party accredited training providers.

2.4.2 Production Practice 4.2

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

	☒ **in full compliance with**	
Orica is:	☐ in substantial compliance with	**Production Practice 4.2**
	☐ not in compliance with	

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

The Facility does train workers in the procedures to be followed if a cyanide release is discovered. Generally, workers are trained to raise the alarm and notify their supervisor. The cyanide awareness training provides guidance on the action to be taken, and these are also detailed in the site emergency plan.

Interviews on site confirmed that the site team knew the response protocols outlined in the emergency response plan and that they would also contact Orica through their 24-hour emergency number. Orica provide technical assistance and support in the event of an incident involving their product.

The Facility does train workers to respond to worker exposure to cyanide and cyanide releases. Workers are trained through the induction process and task training to raise the alarm and notify their supervisor. The facility has identified first responders that would attend the scene, evaluate the situation and decide of the response needed.

Cyanide incident scenarios applicable to the site have been considered through the safety case and associated pre-incident plans. The most credible scenario is a localised minor release of solid cyanide from damage to an IBC via forklift tynes. In addition to inductions and task training, the first responders receive training in first aid, the use of SCBA, spill response and first attack firefighting. Third party training certificates for these were reviewed and confirmed the team has received training.

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 records for workers and identified first responders were reviewed and found to be complete.

2.5 Principle 5 – Emergency Response

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

2.5.1 Production Practice 5.1

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

	☒ **in full compliance with**	
Orica is:	☐ in substantial compliance with	**Production Practice 5.1**
	☐ not in compliance with	

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

Cyanide incident scenarios applicable to the site have been considered through the safety case and associated pre-incident plans. The emergency response plan is a detailed document that forms part of the regulatory assessed safety case. The emergency response plan considers major incident hazards in section 5 including Class 6.1 dangerous goods (cyanide) in the external storage areas. It also details the emergency planning structure for the site including the incident response team (IRT), emergency response team (ERT), chief and area wardens.

The potential failure scenarios are considered for the site through the formalised safety case process. As the site does not manufacture or directly handle cyanide product and there are no cyanide solutions stored at the site, the most credible scenario is a localised minor release of solid cyanide from damage to an IBC via forklift tynes. The release of HCN is considered through the safety case and was concluded that it would be a localised onsite event.

Releases form pipes, valves, tanks, ponds, power outages or waste treatment facilities are not applicable to this facility.

This site emergency response plan is supplemented by the Orica Mining Chemicals Emergency Response Planning Guide – Sodium Cyanide and the site has access to Orica technical and emergency management support via the 24-hour emergency number.

The plan does describe specific response actions for the anticipated emergency situations including evacuation of site personnel, controlling releases and first aid measures.

The *Emergency Planning Manual* contains sufficient procedural information to allow these actions to be conducted and details persons responsible to undertake the actions. These actions have been specified for three scenarios potentially applicable to the storage of cyanide at the facility:

- Release of HCN gas (onsite)
- Releases during loading/unloading (solid spill)

- Releases during fires and explosion

The responsibilities section of the plan details the key actions and responsibilities for the IRT, ERT and wardens. The pre-incident plans developed for potential cyanide events include first aid response. The plan also includes provisions for reviewing the cause and response to the emergency situation to mitigate and prevent future releases.

2.5.2 Production Practice 5.2

Involve site personnel and stakeholders in the planning process.

	☒ **in full compliance with**	
Orica is:	☐ in substantial compliance with	**Production Practice 5.2**
	☐ not in compliance with	

The facility 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. Communities have not been consulted directly within regard to specific cyanide emergencies as no community or neighbouring businesses have been identified as likely to be impacted. This is evaluated through the assessment of potential releases from the facility and the distances involved documented in the Safety Case.

The Safety Case is submitted to the WorkSafe Victoria for assessment and approval providing regulatory review of proposed safety measures for the facility on behalf of the community. Internal stakeholders have been involved in the emergency response planning process through initial document development, training exercises and periodic reviews of the emergency plan

The facility has involved local response agencies such as outside responders and medical facilities in the emergency planning and response process. External responders include Orica, medical facilities, police and fire services.

Emergency response planning and response processes are primarily evaluated through the MHF Facility license and approval process. In addition, the regulator undertakes regular inspections of the Facility for compliance with license conditions including emergency response.

Fire Rescue Victoria (FRV) is a state government agency with responsibility for elements for emergency management including fire and hazardous material incidents. They are a key agency involved in both the prevention of and response to incidents. The local district FRV personnel conduct visits and inspections of the site on a periodic basis.

Orica provide a technical advisory role in the emergency response process in the event of a cyanide release and would attend site as needed to provide technical guidance.

The Facility has engaged in regular consultation and communication with stakeholder to addresses current conditions and risks in the emergency plan. The plan is updated with each revision of the safety case and where necessary. The current plan (Version 36.2) was updated in November 2024.

Orica are consulted with on response planning and regular consultation with internal stakeholders is undertaken via drills and debriefs.

2.5.3 Production Practice 5.3

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

☒ **in full compliance with**

Orica is: ☐ in substantial compliance with **Production Practice 5.3**

☐ not in compliance with

The facility is in FULL COMPLIANCE with Production Practice 5.3 requiring the facility designate appropriate personnel and commit necessary equipment and resources for emergency response.

The emergency plan does designate appropriate personnel and commit necessary equipment and resources. The responsibilities section of the plan details the key actions and responsibilities for the IRT, ERT and wardens. There are established call out processes for activation of emergency response (Section 9 of the plan) including providing 24-hour contact information for designated responders.

Section 13 of the plan details emergency equipment onsite including SCBA, decontamination facilities, spill response and firefighting equipment. Section 15 of the plan details first aid arrangements with a specific subsection on cyanide exposure.

Supporting procedures and inspection checklists have been developed by the site that include the inspection and testing of emergency equipment. A site inspection confirmed that equipment applicable to cyanide incidents was available and ready for use.

The plan does describe the role and interface with outside responders and these include FRV, medical facilities and the police. Orica are available for technical support and advice through their 24 hour emergency number.

As an MHF, the role of outside entities is mandated through the emergency response framework implemented by the government of Victoria. There is formalised licensing and regulatory oversight of the facility, including emergency response aspects.

The types of cyanide related emergencies identified are unlikely to require the assistance of outside responders except for large scale fires, where the FRV become the lead agency and control the scene. Orica and TGL would provide technical advice and support as requested.

2.5.4 Production Practice 5.4

Develop procedures for internal and external emergency notification and reporting.

☒ **in full compliance with**

Orica is: ☐ in substantial compliance with **Production Practice 5.4**

☐ not in compliance with

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

The emergency response plan does include procedures and contact information for notifying management, regulatory agencies, outside response providers and medical facilities of the emergency, as appropriate.

The plan outlines the process for contacting Toll's Emergency Response Centre, notifying FRV and the police, contacting Ambulance Victoria and neighbouring business (as needed). Contact details are provided in the plan and are regularly checked.

Major incidents are considered through the Safety Case and offsite impacts from cyanide related incidents have not been identified specifically for cyanide, accordingly there a no specific cyanide notifications or response measures communicates developed. The pre-incident plan for sodium cyanide includes the requirement to notify Orica of the incident with specified personnel and contacts listed.

There are other chemicals stored at the site that have been identified as having potential for offsite impacts and there are established procedures and pre-planned messaging for neighbouring business that could be impacted by an incident on the site. A fire (whether it involves cyanide or not) on the site would trigger this notification process. Major incidents at the facility would involve attendance of FRV who would take command, and their community notification process would apply.

Interviews with key site personnel confirmed that communication protocols have been established, and that media engagement would be managed by Toll's corporate team. Toll report incidents relating to cyanide to Orica regardless of the severity of the incident. Orica has a written procedure for notifying the ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. This is detailed in Orica's ICMC reporting procedure. There have been no significant cyanide incidents at the facility during the audit period.

2.5.5 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**	
Orica is:	☐ in substantial compliance with	**Production Practice 5.5**
	☐ not in compliance with	

The facility 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 response plan and supporting documents do provide specific and appropriate remediation measures for the site. The facility stores packaged solid sodium cyanide in IBCs in shipping container or isocontainers. These containers are stored on sealed surfaces.

Given the limited handling activities, physical infrastructure and controls implemented at the facility the release of cyanide product and subsequent contact with soil or water is considered highly unlikely. Notwithstanding, there is a pre-incident plan that addresses the loss of containment of cyanide product and associate spill containment and collection actions. The procedure involves the notification of Orica who will provide additional technical advice on clean up and disposal of the debris based on the situation.

The provision of an alternative drinking water supply is not identified as a necessary control. Potable water to the area and surrounding area is provided through reticulated mains supply and there is no credible release event on the site that could contaminate the drinking water supply.

The pre-incident plan for cyanide related emergencies does include the prohibition on the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water. The release to surface water is not considered a credible scenario for this facility and is cyanide related activities.

The plan does address potential need for environmental monitoring. There is an onsite stormwater containment system and sampling would be focussed on assessing in there are contaminants within these containments to prevent offsite release.

The potential for contact of cyanide bearing material to contaminant soil is evaluated through the safety case incident scenario and considered highly unlikely. Should the situation eventuate, then Orica would provide technical advice and support following notification. Orica's Emergency Response Guide provides information on qualitative test for environmental monitoring and details sampling methods and analytes for cyanide on surfaces and in water and soil and a scope specific plan developed.

2.5.6 Production Practice 5.6

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

	☒ **in full compliance with**	
Orica is:	☐ in substantial compliance with	**Production Practice 5.6**
	☐ not in compliance with	

The facility is in FULL COMPLIANCE with Production Practice 5.5 requiring the periodically evaluation of response procedures and capabilities and revision of them as needed.

The emergency response plan does contain provisions for periodically reviewing and evaluating the plan's adequacy and they are being implemented. The Emergency Planning Manual is at revision 36 and is also part of the formalised review required under the facilities safety case. The operation has also conducted a number of mock drills as part of the review and evaluation process.

Mock emergency drills are undertaken as part of the emergency preparedness evaluation process. In addition to mock drills of this nature, the site ERT also receives practical training through maintaining qualifications such as SCBA and fire response.

There are provisions to evaluate the plan and revise as necessary after its use. In addition to the debrief and review process, the facility has a formal incident and investigation process that would be triggered in the event of an emergency.

There have been no incidents at the facility that have resulted in the activation and subsequent review of cyanide elements of the emergency response plan.