

Our ref: CB/RU10169/002
Your ref:

Date: 10 August 2021

Mark Montoya
Director of Standards Assurance
International Cyanide Management Institute
1400 I Street, NW, Suite 550
Washington DC 20005 USA

Dear Mark

Polyus Verninskoye Operational Verification Audit

Verninskoye underwent their initial International Cyanide Management Code (“Code”) certification audit in 2019/2020 including a site visit. The audit identified three (3) Standards of Practice as being “substantially compliant” with the Code, with regard to the implementation of a colourant dye into the cyanide process. Polyus are aware that the inclusion of the standard for adding dye and was auditable from July 2019, and in good faith Polyus commenced trials using a dye at their research facility.

Polyus commented: “..... had already completed the research including bio-tests”. Polyus has shared some of the results with us. Polyus further comment that they generally now understand how to use dyes and the amount to add and that it does not influence the process.


Polyus are now investigating two options:

1. discussing the possibility of the colorant dyes being added by their suppliers and amending their request for tender for this to be an obligatory condition of tender; and
2. proceeding with industrial tests for the addition of a colourant dye during the cyanide mixing stage and to understand what extra equipment, process changing, controls, trainings may need to be implemented.

This Corrective Action Plan will become active from the date of issue (10 August 2021 till 9 August 2022) for Polyus rectification within the 12 months in accordance with the Code.

The details of the deficiency are provided in the Corrective Action Plan (CAP) in Table 1 below.

Regards



CHRISTINE A BLACKMORE
ICMI Lead Cyanide Auditor
Wardell Armstrong International



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Table 1: Polyus Verninskoye Corrective Action Plan

Standard of Practice	Summary of Requirement	Deficiency	Corrective Action Required	Evidence required for Verification	Planned Completion Date
2.1.1 c	<p>Is there a written agreement between the operation, the cyanide producer, distributor, and transporter(s) designating responsibility for the following, as applicable?</p> <p>c) Addition of colorant dye to high strength liquid cyanide prior to delivery at the mining operation, and addition of colorant dye to solid cyanide prior to or at the time of mixing (Note: This item will become auditable as of July 1, 2019. Companies are encouraged to include this requirement in agreements prior to that date, and for audits conducted prior to July 1, 2019, auditors are asked to note within the Detailed Audit Findings Report whether this requirement is already included in current agreements.)</p>	Colourant dye not added	Complete research and trials of colourant dye in readiness for inclusion in the cyanide circuit process, at mixing stage.	<ol style="list-style-type: none"> 1. Written statement of the changes made; 2. Amendments to relevant documents; 3. Procedures implemented; 4. Training records for responsible personnel; 5. Photographic record. 	9 August 2022
3.2.2 f	<p>Has the operation developed and implemented plans or procedures to prevent exposures and releases during cyanide unloading and mixing activities such as:</p> <p>f) Addition of colorant dye to solid cyanide prior to or at the point of mixing into solution? (Note: This item will become auditable as of July 1, 2019. Companies are encouraged to adopt this practice prior to that date, and for audits conducted prior to July 1, 2019, auditors are asked to note within the Detailed Audit Findings Report if the practice has already been adopted.)</p>	Colourant dye not added	Complete research and trials of colourant dye in readiness for inclusion in the cyanide circuit process, at mixing stage.	<ol style="list-style-type: none"> 1. Written statement of the changes made; 2. Amendments to relevant documents; 3. Procedures implemented; 4. Training records for responsible personnel; 5. Photographic record. 	9 August 2022



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Standard of Practice	Summary of Requirement	Deficiency	Corrective Action Required	Evidence required for Verification	Planned Completion Date
6.2.6	<p>Operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.</p> <p>Is high strength cyanide solution dyed for clear identification? (Note: This item will become auditable as of July 1, 2019. Companies are encouraged to adopt this practice prior to that date, and for audits conducted prior to July 1, 2019, auditors are asked to note within the Detailed Audit Finding Report if the practice has already been adopted).</p>	Colourant dye not added	Complete research and trials of colourant dye in readiness for inclusion in the cyanide circuit process, at mixing stage.	<ol style="list-style-type: none"> 1. Written statement of the changes made; 2. Amendments to relevant documents; 3. Procedures implemented; 4. Training records for responsible personnel; 5. Photographic record. 	9 August 2022