
CORRECTIVE ACTION PLAN

Evander Mine Elikhulu Tailings Retreatment Plant **South Africa**

Introduction

One of the components of the auditing of the ICMI (International Cyanide Management Institute) Cyanide Code is the development of a Corrective Action Plan for those parts of the audit findings that have been found to be in substantial compliance and requiring focussed responses to take the site to full compliance.

ICMI requirements indicate that Corrective Action Plans, and notification thereof, must be completed within 12 months of posting of the Plan on the ICMI website.

The section below details the corrective actions, agreed by the Evander Mine Elikhulu Tailings Retreatment Plant and the Lead Auditor, necessary to bring the Evander Mine Elikhulu Tailings Retreatment Plant into full compliance, as indicated in the Detailed Audit Report.

Corrective Action Plan - 1

Principle 4 – Operations: Manage cyanide process solutions and waste streams to protect human health and the environment.

Standard of Practice 4.4 Implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.

Deficiencies

- The past few months have shown high WAD (Weak Acid Dissociable) cyanide levels in open waters at the tailings storage facility, but the results of some recent changes have begun to see falling WAD cyanide levels. The site intends to put intensive effort, over the next month, to reduce WAD cyanide levels to below 50mg/l WAD cyanide consistently. Any spikes or exceedances that occur will be investigated and, where possible, corrective action taken to prevent re-occurrence. A first certification audit does not need to review history, as it is assumed that the site was not necessarily Code compliant before the audit. The site will feed regular progress reports to the Technical Auditor. Evidence in 4.2 cyanide optimisation, is supporting evidence for significant improvement.

Corrective Actions

1. Auditors need to sight a minimum of 3 months' data of WAD cyanide results that are below 50 mg/l WAD cyanide, or if there are exceedances, these should be investigated, and corrective action implemented where possible and appropriate.

-
2. Investigation reports must be available for inspection, and WAD cyanide results must be graphed per day (daily averages).
 3. WAD cyanide levels from the process water pond and the spillage ponds must be reported.
 4. The WAD cyanide values from CIL 9 daily sample using the laboratory Cynoprobe WAD cyanide analyser, calibrated with standards, should be presented daily and commence as soon as possible.

Evidence for Auditors

Evidence required by auditors to confirm the corrective actions have been implemented effectively: -

1. a minimum of 3 months' data of WAD cyanide results that are below 50 mg/l WAD cyanide.
2. Investigation reports must be forwarded to the auditors for inspection, and WAD cyanide results must be graphed per day (daily averages).
3. Over the same period, WAD cyanide levels from the process water pond and the spillage ponds must be reported and graphed per day (daily averages).
4. The WAD cyanide values from CIL 9 daily samples, using the laboratory Cynoprobe WAD analyser, calibrated with standards, should be presented daily and commence as soon as possible.

Corrective Action Plan - 2

Principle 8 – Training: – Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner

Standard of Practice 8.1 Train workers to understand the hazards associated with cyanide use.

Deficiencies

1. There appears to be a disjoint between the records and the systems of the late Ismail Shabangu (Who passed away suddenly from Covid-19), the plant trainer, and his replacement. This needs to be resolved as soon as possible to ensure that due training is undertaken on time, and the records are updated timeously.
2. The noted weakness appears to be with contractor records with cyanide training. The auditors need to see evidence that all contractors were up to date on their cyanide awareness training by the date of the certification audit.

Corrective Actions

1. Review contractor cyanide training records using attendance registers and enter them in the training matrices, as appropriate.

-
2. Develop a system that ensures that all training records are uploaded to the appropriate matrices.

Evidence for Auditors

Evidence required by auditors to confirm the corrective actions have been implemented effectively: -

1. Send auditors copies of the updated matrices showing contractor cyanide training records up to the certification audit.
2. Send evidence of the procedure/managerial instruction or similar, which describes the system in place to transfer raw training data into the matrices, as appropriate.

Completion Date: 19 March 2022



Arend Hoogervorst
Lead Auditor

Mr SS de Wet
Plant Manager – Evander Mine Elikhulu Tailings Re-Treatment Plant

