



The CODE

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Jessica van Onselen Elected to ICMI Board of Directors



Jessica van Onselen

Jessica van Onselen, an accomplished communications advisor with deep experience in mining, has been elected to the International Cyanide Management Institute's Board of Directors.

Ms. van Onselen began her career at gold mining major [AngloGold Ashanti](#) in Johannesburg, South Africa, where she worked from 2005 to 2013. In her final role she served as head of Public Affairs for the company's Africa region, leading the company's government relations and external affairs. During her time at AngloGold, she worked extensively on sustainability issues and political risk management.

Seconded to the [World Gold Council](#) in London between 2011 and 2012, Ms. van Onselen worked with the WGC's Responsible Gold team to develop the organization's [Conflict Free Gold Standard](#). Later, as an independent consultant, she worked with the African Union and the African Minerals Development Centre in Addis Ababa. She also spent several years on the Mineral Production Monitoring Support Programme in Zambia, an EU-funded project focused on strengthening the integrity of production data in Zambia's mining sector, particularly copper. The team was embedded in the Ministry of Mines and Minerals Development in Lusaka from 2016-2018.

In 2020, Ms. van Onselen founded [BrightGuide Africa](#), a niche communications firm based in the United Kingdom. Currently, she is the Communications and Marketing Director at [Apolitical](#), a London based tech-start up supporting public servants and governments around the world in solving 21st century problems.

Ms. van Onselen studied at the University of the Witwatersrand and Wits Business School in South Africa, where she was awarded both Bachelor's and Master's degrees.

Cyanide Code Adds Two Mining Signatories

ICMI in September added two mining companies to its list of Cyanide Code signatories.

These include [Demir Export A.Ş.](#), a Turkish company that operates the Bakırtepe Gold Mine in Turkey's Sivas Province. Bakırtepe is an open pit mine that uses

the heap leach process to recover gold. The other new mining signatory is [Al Masane Al Kobra Mining Company](#) (AMAK) in the Kingdom of Saudi Arabia, which operates the Guyan Gold Mine, an open-pit mining facility that processes mined ore using a vat leaching process. The mine, which is in the southwest of Saudi Arabia, commenced production in late 2020.

By becoming signatories to the Cyanide Code, both companies have committed to follow the Cyanide Code's Principles and implement its Standards of Practice, and to have certification audits of their operations conducted by qualified, independent third-party auditors within three years of their initial applications to ICMI, and every three years thereafter.

Helisangela Alencar Elected IAG Chair

Helisangela Alencar, Senior Manager, Safety & Sustainability Audit for [Kinross Gold Corporation](#), has been elected Chair of ICMI's Industry Advisory Group (IAG). The IAG is a forum to advance the education, communication, and discussion about the implementation of the International Cyanide Management Code amongst the program's participating signatory companies. Ms. Alencar, a native of Brazil, has been with Kinross since 2009, and during her time with the company she has worked in Brazil, Russia, and Canada in the areas of continuous improvement and risk management. In her current role, she is based in Toronto and is responsible for the execution of Kinross' global safety and sustainability risk management strategies. She will serve a two-year term as IAG Chair.

Country Focus: The Cyanide Code in Turkey

Turkey has a rich history of gold mining stretching back thousands of years, which continues today. The modern gold mining industry in Turkey is flourishing and produced 39.5 metric tonnes of gold in 2021, according to research firm [Metals Focus](#).

There is growing interest in Turkey about the Cyanide Code from gold mining companies operating in the country. Currently, there are four mining companies with operations in Turkey that are signatories to the Cyanide Code: [Centerra Gold Inc.](#), [Eldorado Gold Corporation](#), [Demir Export](#), and [Tümad Madencilik A.Ş.](#) Already, two mines are certified to the Cyanide Code, [Eldorado's Kışladağ](#) and [Tümad's Lapseki](#). Three other mines operated by Code-signatories are working towards certification: [Centerra Gold Inc's Öksüt Mine](#), [Tümad's Ivrindi](#), and [Demir Export's Bakirtepe](#).

ICMI anticipates additional mining companies with operations in Turkey will become Code signatories in the near future.



ICMI's Management team discusses cyanide management with Turkey's General Directorate of Mining and Petroleum Affairs, Department of Metallic Mines.

One Code-certified transporter is operating in Turkey, [To-Pet A.S.](#) and five certified supply chains are delivering cyanide in Turkey.

Recently, ICMI's management team met with officials from Turkey's [General Directorate of Mining and Petroleum Affairs, Department of Metallic Mines](#) to discuss cyanide management and the Cyanide Code. The ICMI team also had the opportunity to meet with the leadership of the [Turkish Gold Miners Association](#) and several of its member companies to discuss the Code's implementation in Turkey and ways the two organizations can work cooperatively to advance the Code's adoption in Turkey by the broader gold and silver mining sectors.



ICMI Management team met recently with the leadership of the Turkish Gold Miners Association and some of its member companies' representatives.

While in Turkey, ICMI management and Board of Directors had the opportunity to visit Tümad Madencilik's Lapseki mine and discuss the operation's experience with implementation of the Cyanide Code. ICMI thanks Tümad Madencilik and the Lapseki operation for the discussions and for hosting the mine visit.



ICMI Board and Staff visited the TUMAD's Lapseki Mine, a Cyanide Code certified operation.

Fly the Flag

ICMI has Cyanide Code flags available for certified operations. The flags, which are 3 feet by 5 feet and cost US\$100.00 each, show the Code logo on a white background. Bulk pricing is available for orders of 10 or more flags. Certified operations can order a flag by contacting ICMI at info@cyanidecode.org. Flying a Cyanide Code flag is a dramatic way to demonstrate that your operation is Code-certified.



Please note that the flag depicted above is from an artist rendering and not an actual photograph.

Auditor's Corner: Detailed and Summary Audit Reports

Welcome to this installment of the Auditor's Corner, a continuing feature of *The Code*. As readers know, this column is intended not only for auditors but also for operations preparing for audits or gap analyses. We welcome your suggestions for future topics at info@cyanidecode.org.

The lead auditor for a Cyanide Code certification audit must submit to ICMI a Detailed Audit Findings Report (DAFR) responding to the individual questions provided in the appropriate Verification Protocol. The auditor must also submit a Summary Audit Report (SAR), which summarizes the responses contained within the DAFR to the Verification Protocol Questions for each Standard of Practice and includes the auditor's conclusion regarding the operation's overall compliance with the Cyanide Code. The DAFR is the confidential property of the operation and is not released by ICMI in any fashion without the written consent of the signatory and/or audited operation, while the SAR is made available to the public on the Cyanide Code website.

ICMI conducts a "Completeness Review" of the audit documents submitted for each certification audit, which includes the DAFR and SAR, to ensure that all necessary information has been provided prior to taking the appropriate action regarding an operation's certification and posting the results on the Cyanide Code website. ICMI's review of the DAFR determines whether all relevant protocol questions (including subparts) have been answered, whether the answers are responsive to the issues raised, and whether sufficient details are provided in support of the auditor's findings. ICMI reviews the SAR to ensure that it accurately represents the results presented in the DAFR and includes sufficient information to demonstrate the basis for each finding under the Standards of Practice.

In writing the SARs, auditors use several approaches, all of which are acceptable. Some auditors include the complete responses to the Verification Protocol questions provided in the DAFR for each Standard of Practice in the SAR, only removing redundant

and/or confidential information, as necessary. Other auditors create an abridged narrative summary of the DAFR responses. Still other auditors use a combination of these approaches. The method used may depend on the auditor's preference and the operation or company's preference.

While any of these approaches are acceptable, each presents potential issues with respect to completeness. In the first approach, where the auditor includes material from the DAFR responses with little editing, care should be taken to provide context in the summary finding because the SAR does not include the individual questions from the Verification Protocol as context. Without context, stakeholders reading the SARs online, who are not as familiar with the Code as auditors and operators, may not understand how certain information relates to a particular Standard of Practice. In the second approach, where information from the responses in the DAFR is summarized, the auditor should take care to ensure that the SAR; 1) accurately represents the results presented in the DAFR, 2) includes sufficient information to demonstrate the basis for each finding, and, 3) does not present information separately from the DAFR, such as additional evidence or details.

When developing the SAR, auditors should carefully review the draft to ensure that there are no discrepancies between the DAFR and SAR, such as varying inspection frequencies, facility descriptions, contradictory statements and so forth. As an example, a DAFR may state that an emergency response plan is reviewed annually, while the SAR may state that the emergency response plan is reviewed every two years. This leaves ICMI unsure regarding which statement is accurate. Where discrepancies occur between information contained in the DAFR and SAR, ICMI will ask the auditor to reconcile or explain each discrepancy.

The SAR, which is made available to all stakeholders, is intended to provide a summary of the detailed information included within the DAFR prepared for the certification audit and should not present information separately from the DAFR. Thus, the SAR should include only information that is presented in the DAFR. As an example, the SAR finding for Standard of Practice 3.1 might indicate that the operation did not make changes to the cyanide unloading, storage and mixing facilities during the ICMI audit period, while the DAFR makes no such statement. This leaves ICMI unsure as to whether any such changes did, in fact, occur.

For many recertification audit reports, auditors also use the previous DAFR and SAR as a beginning template for developing the DAFR and SAR for the current audit. Although this practice is common and acceptable, auditors should carefully review both the DAFR and SAR before submission to ensure that all obsolete information and descriptions have been revised and updated and that the information in the DAFR and SAR are compatible when submitted to ICMI.

If ICMI identifies information during its Completeness Review that is included in the findings for Standards of Practice within the SAR, but that is not included in the responses to Verification Protocol Questions within the DAFR, ICMI will request in its Completeness Review Letter that the auditor either include the indicated information contained in the SAR in the response to the appropriate DAFR Verification Protocol Question if it is accurate or remove the information from the SAR.

ICMI appreciates the rigor and care which auditors already take when developing the audit reports and hopes that attention to these particular issues will help streamline the Completeness Review process.