



The CODE

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Welcome to the 3rd Quarter 2024 edition of *The Code*.

ICMI to Hold Training Workshop in Accra, Ghana on October 8-9, 2024

[The International Cyanide Management Institute \(ICMI\)](#) in cooperation with [The Ghana Chamber of Mines](#) will be conducting a workshop in Accra, Ghana on October 8-9, 2024 on best practices in cyanide management, with a focus on implementing and auditing the Cyanide Code.

This one and a half-day workshop is intended to assist gold mining companies, cyanide transporters, companies manufacturing and warehousing cyanide, and other stakeholders in understanding the Code's expectations for responsible management of cyanide. The workshop is also intended to instruct compliance auditors on how to evaluate mining operations and cyanide transporters to properly report their findings.

A further goal is to provide an opportunity for companies that have not yet become signatories to learn about the Cyanide Code first-hand, and for workshop participants to discuss with ICMI officials those issues of greatest importance to them. The Cyanide Code has been widely adopted across the gold sector amongst the most established certification programs in the mining sector.

The Cyanide Code currently is being implemented at 140 gold mines, 47 cyanide production, warehousing, and repackaging facilities and 184 transport operations in 51 countries worldwide.

The training will be conducted in English by Eric Schwamberger, PhD, Senior Vice President of the ICMI. Prior to joining the ICMI team in 2013, he was Manager, Environmental Affairs for Kinross Gold Corporation, and previously worked on the environment team at BHP. He brings 30 years of success in managing Environmental, Health & Safety programs at mining and other industrial facilities throughout the world, including the United States, Canada, Africa, South America and the South Pacific.

The fee for the workshop is US\$375 per person and includes lunch on October 8. Companies registering six or more participants will receive a 10% discount.

The workshop will be held at the [Alisa Hotel North Ridge](#), 21 Dr. Issert Street, Accra, Ghana. Their telephone is +233 30 221 4233. Workshop participants are responsible for making their own arrangements for lodging.

[For a detailed agenda click here.](#)

[For registration information click here.](#)

Cyanide Code Welcomes Three New Signatories

In the first two months of the third quarter, the Cyanide Code welcomed three new signatories.

The companies are: [M+L LOGISTIK s.r.o.](#), a transporter based in Czechia; [Rawabi Marketing International Co.](#), a transporter based in Saudi Arabia; and Puerto Columbo, based in Chile, which operates warehouses storing cyanide. With the addition of these companies, the Cyanide Code now has 229 signatories worldwide.

Auditor's Corner: Protection of the Beneficial Uses of Groundwater

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 assessments. We welcome your suggestions for future topics at info@cyanidecode.org.

This edition discusses the Cyanide Code's expectations for groundwater monitoring at mining operations and compliance with applicable regulations regarding cyanide concentrations in groundwater beneath and downgradient of an operation's cyanide facilities. Principally, the Code is concerned with ensuring that the concentration of cyanide measured in groundwater is protective of the beneficial uses of the water.

Standard of Practice 4.6 is one of the few Code provisions that is directly linked to how the applicable jurisdiction has decided to protect its resources. Thus, it is important to note that compliance with this Standard requires that operations protect the actual use of groundwater, or the beneficial use established by the applicable regulatory agency, rather than achieving a use or level of protection stipulated by the Code or by implementing specific design, construction and operational methods.

Question 4.6.2 in the [Mining Operations Verification Protocol \(June 2021\)](#) asks whether an operation monitors for cyanide in groundwater downgradient of the site and whether the operation can demonstrate that concentrations of WAD cyanide (or other species of cyanide for which there is a numerical standard established by the applicable jurisdiction) in groundwater at compliance points below or downgradient of the facility are at or below levels that are protective of identified beneficial uses of the groundwater.

To verify compliance, an auditor should consider the following questions:

1. Is there a beneficial use of the groundwater beneath and/or immediately downgradient of the operation's cyanide facilities?
2. Is there a numerical standard for cyanide in groundwater established by the applicable jurisdiction?
3. Are there compliance points where a numerical standard must be met?
4. Are cyanide concentrations in groundwater at compliance points protective of the identified use(s)?

In evaluating Protocol Question 4.6.2, an auditor should first determine whether there is a beneficial use of the groundwater beneath and/or immediately downgradient of the operation's cyanide facilities. For purposes of the Code, this beneficial use must either be a use designated by the applicable jurisdiction or an actual use, such as drinking water, agriculture, mineral processing, and so forth.

Secondly, if a beneficial use is designated or an actual use exists, then the auditor should note any numerical standard established for protection of that use. If the applicable jurisdiction has not established a numerical standard, then the

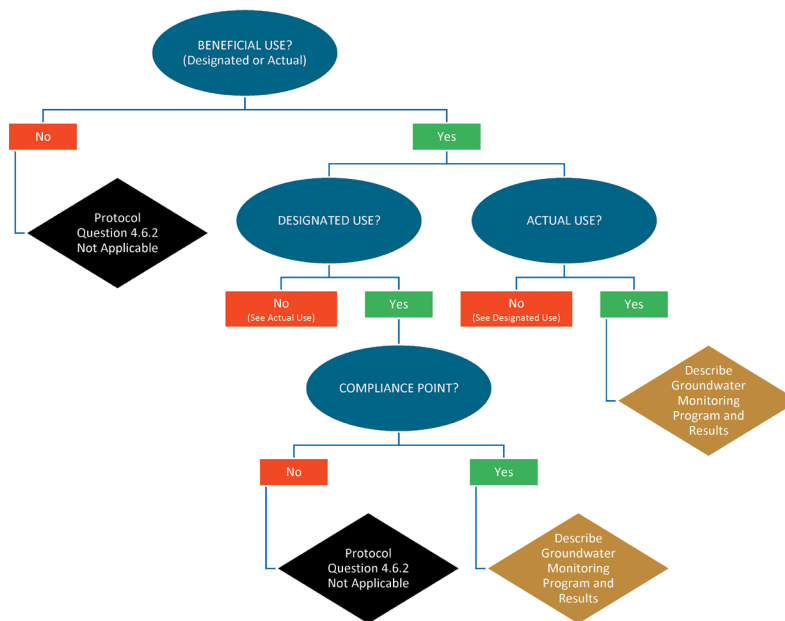
operation should apply an appropriate concentration for that use based on standards from the political jurisdiction or from technical literature.

Next, the auditor must determine the location where the numerical standard must be met. The Code requires that compliance with the beneficial use standard be measured either at a point of compliance established by the regulatory jurisdiction or, if there is no jurisdictional designated use or compliance point, at the point of groundwater withdrawal for an actual use.

Finally, if a beneficial use is designated and regulatory compliance point(s) exist, or an actual use exists, the auditor must describe the operation’s program for monitoring groundwater quality, including groundwater quality results for the Code certification period.

As shown in the flowchart below, there are two situations where this protocol question would not apply to an operation, including: 1) if no designated or actual use exists; and 2) if no actual use exists and the jurisdiction has designated a beneficial use but not a point of compliance. In these cases, the auditor should indicate that this question does not apply and explain the reason.

The following discussion further illustrates the applicability of Protocol Question 4.6.2 to an operation.



If the jurisdiction has designated a beneficial use of groundwater at an operation but does not require monitoring (i.e., there is not a compliance point), then the protocol question would not apply. However, in the case where the jurisdiction has designated a beneficial use and does require monitoring at a compliance point, the question would apply, and the auditor should describe the operation’s groundwater monitoring program and the results, indicating the designated use and the numerical standard. The protocol question applies in all cases where an actual use of the groundwater beneath and/or immediately downgradient of the operation’s cyanide facilities exists, even when the jurisdiction has not designated a beneficial use and/or does not require groundwater monitoring by permit. Thus, for an actual use, the auditor should always describe the operation’s groundwater monitoring program and the results at the point(s) of groundwater withdrawal for the use, indicating the actual use and numerical standard.

For completeness, it is important that in the auditor’s documents and in the audit reports, that the determination of each of the four aspects above is listed and described above. The auditor’s response should also indicate whether the concentration of cyanide measured in groundwater is protective of the beneficial use(s), as appropriate.