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**Evolution Mining - Cowal Gold Mine** 

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International Cyanide Management Code Gold Mining Operations

# ICMI SUMMARY AUDIT REPORT EVOLUTION MINING -COWAL GOLD MINE



# ICMI SUMMARY AUDIT REPORT EVOLUTION MINING - COWAL GOLD MINE

Project name Cowal Gold Mine – ICMI Recertification Audit

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#### SUMMARY AUDIT REPORT

#### Name of Mine

Cowal Gold Mine

#### **Name of Mine Owner**

Evolution Mining (Cowal) Pty Ltd

### **Name of Mine Operator**

Evolution Mining (Cowal) Pty Ltd

#### Name of Responsible Manager

John Penhall, General Manager

#### **Address**

Cowal Gold Mine PO Box 210 West Wyalong 2671 New South Wales, Australia

#### **Contact Information**

Telephone: +61 2 6875 4766

Email: aynah.delacruz@evolutionmining.com

#### **Location Detail and Description of Operation**

Evolution Mining owns and operates five gold operations, with an economic interest at Ernest Henry in Queensland. Two of the Evolution owned operations are located in Queensland, one in New South Wales, one in Western Australia, and one in Ontario, Canada. Evolution Mining's diversified portfolio combining production and growth has made it become the second largest Australian Stock Exchange (ASX) listed gold miner. In 2015, Evolution Mining acquired 100% interest in the Cowal Project from Barrick Gold Corporation.

The Cowal Gold Mine (Cowal) is located on the western shore of Lake Cowal, approximately 32 km northeast of West Wyalong in Mid-Western New South Wales. The mine commenced operations in 2005 and scheduled to continue until 2032 at current estimates.

The main components of Cowal are:

- An open pit which, on completion of mining, would measure approximately 1.2 km by 1.0 km and 500 m deep;
- A processing plant to extract the gold from the mined ore;
- Waste rock emplacements which would contain mined rock that has no commercial quantities of gold;
- An Integrated Waste Landform (IWL), which incorporates the previous two tailing storage facilities (TSF), which would contain the slurry residue from the processing plant;
- A lake isolation system to separate the Project from Lake Cowal over the long term;
- A 132 kV electricity transmission line from Temora to the project (some 90 km in length); and
- An access road (approximately 3 km) to the Project.

The Cowal process plant treats oxide and sulphide ore and consists of primary crushing, crushed ore stockpiling, grinding, pebble recycle crushing, gravity concentration, intensive cyanide





leaching (batch process), flotation, ultra-fine grinding and leaching, elution, electrowinning and smelting. Caro's Acid and the INCO process are used to treat the leach tailings to destroy the cyanide to prescribed limits, which are then pumped to the Integrated Waste Landform.

The process plant was designed to ensure cyanide levels in the IWL would be a maximum of 30 mg/L and, for 90% of the time, would be below 20 mg/L measured as Weak Acid Dissociable (WAD) Cyanide.

Cyanide is delivered to site dry in 22 tonne isotainers of dry sodium cyanide pellets. The cyanide is transferred into the plant by sparging the tankers into the process plant holding tanks.

The Operatio	n is:
	IN FULL COMPLIANCE
$\boxtimes$	IN SUBSTANTIAL COMPLIANCE
	NOT IN COMPLIANCE

With the International Cyanide Management Code.

This operation has experienced limited compliance oversights during the previous three-year audit cycle in relation to Standards of Practice 4.1 and 7.6.

#### **Audit Company**

**Auditors Finding** 

Ramboll Australia Pty Ltd Level 7 41 St Georges Terrace Perth, WA, 6000 Australia

Telephone: +61 8 9225 5199 Web: <a href="https://ramboll.com/">https://ramboll.com/</a>

#### Date(s) of Audit

The site audit was conducted inclusive of the 16th - 20th May 2021

#### **Audit Team**

**Lead Auditor** – Marc Barendrecht (<u>mbarendrecht@ramboll.com</u>)

22<sup>nd</sup> November 2021

Technical Specialist - John Miragliotta

Mercdedt



17th August 2021

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 Mining Operations Verification Protocol and using standard and accepted practices for health, safety and environmental audits.



# **PRINCIPLE 1 - PRODUCTION**

Encourage responsible cyanide manufacturing by purchasing from manufacturers who operate in a safe and environmentally protective manner.

### Standard of Practice 1.1

Purchase cyanide from manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment.

	☐ IN FULL COMPLIANCE	
The operation is	☐ IN SUBSTANTIAL COMPLIANCE with	Standard of Practice 1.1
	□ NOT IN COMPLIANCE	
Based on the findings of	of the audit the operation is in Full Compliance v	with Standard of Practice

Orica is the sole cyanide supplier to the mine operation, the product being produced at the Yarwun facility, Queensland, which was re-certified under the Code on 22 February 2017 and on the 17 September 2020.





# **PRINCIPLE 2 - TRANSPORTATION**

Protect communities and the environment during cyanide transport.

	<b>2.1</b> responsibility for safety, security, release prevention, training and written agreements with producers, distributors and transporters.
	IN FULL COMPLIANCE
The operation is	☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 2.1.
	□ NOT IN COMPLIANCE
Based on the findings (2.1.	of the audit the operation is in Full Compliance with Standard of Practice
Chain, which includes	cyanide supplier and is certified under the Code. Orica's Australian Supply transport to the Cowal Gold Mine, was certified as compliant with the Code 8. The contracted trucking companies that deliver sodium cyanide to the ified under the Code.
	<b>2.2</b> ransporters implement appropriate emergency response plans and vadequate measures for cyanide management.
	☐ IN FULL COMPLIANCE
The operation is	IN SUBSTANTIAL COMPLIANCE with Standard of Practice 2.2.
	☐ NOT IN COMPLIANCE

Based on the findings of the audit the operation is in Full Compliance with Standard of Practice 2.2.

The operation purchases its cyanide from Orica under a written Supply Agreement that designates responsibility for the aspects of cyanide transportation required by the Code.

The Supply Agreement has clear lines of responsibility for safety, security, release prevention, training and emergency response as required by the International Cyanide Management Institute (ICMI) Cyanide Transportation Audit Protocol.

The supply agreement requires that the transporter and its subcontractors comply with the Code. Orica's Australian Supply Chain (for cyanide transport) was re-certified as compliant with the International Cyanide Management Code (ICMC) on 20<sup>th</sup> August 2018. The contracted road transporter that delivers cyanide to the Cowal operations is also certified to the Code. The operation has chain of custody records (in the form of waybills) available on site that verify all transporters involved in the transport of cyanide to site are certified in accordance with the ICMC.





### PRINCIPLE 3 – HANDLING AND STORAGE

Protect workers and the environment during cyanide handling and storage.

#### Standard of Practice 3.1

Design and construct unloading, storage and mixing facilities consistent with sound, accepted engineering practices, quality control/quality assurance procedures, spill prevention and spill containment measures.

	☐ IN FULL COMPLIANCE	
The operation is	☐ IN SUBSTANTIAL COMPLIANCE with	Standard of Practice 3.1.
	☐ NOT IN COMPLIANCE	

Based on the findings of the audit the operation is fully compliant with Standard of Practice 3.1.

The cyanide handling and storage facilities have been built to the standards of the mine's cyanide manufacturer and supplier, Orica, in order to receive cyanide via sparge isotainers. The facilities were inspected by an engineering consultant that concluded the unloading, mixing and storage facilities have been designed and constructed in accordance with sound engineering practices and jurisdictional rules.

The unloading and storage areas are located away from people and surface waters. The nearest surface water body is Lake Cowal 1.0 km to the south-east and not hydraulically connected to the unloading and storage areas. All areas permanently occupied by the workforce are not in the vicinity of the facilities. A qualitative risk assessment of the cyanide facilities in the unloading and storage areas in respect to potential for releases to surface water and/or human exposure determined that the facilities and location of the compound provide such protection with the existing controls that no further risk reduction action is currently required.

Cyanide from the sparge isotainer is unloaded on a concrete surface which prevents seepage to the subsurface. The surface has also been designed and constructed to drain any unplanned spillage or hose up solution to the secondary containment that surrounds the cyanide mixing and storage tanks.

There are methods in place to prevent the overfilling of cyanide day (storage) tank and the cyanide (sparge) mixing tank. Both tanks have both been installed with level indicators that display on the distributed control system (DCS) in the plant control room. High and High-High level alarms are configured on each tank. Monthly preventative maintenance checks are conducted on the cyanide mixing and storage tank level instruments to manage their reliability.

The cyanide storage and cyanide sparge mixing tanks are located on a concrete surface that prevents seepage to the subsurface. As-built drawings show that the mixing and storage tanks have been installed on concrete ring beams with compacted fill placed in the annular space, topped by layers of concrete and bitumen to prevent potential leakage reaching the natural subsurface.

Secondary containments for cyanide storage and mixing tanks (i.e. bunding and flooring) are constructed of concrete, which provides a competent barrier to leakage.





Cyanide is stored with adequate ventilation to prevent the build-up of HCN gas. Cyanide is delivered in solid briquette form in isotainers, where it is mixed via the sparging process and stored in the storage tanks. These tanks are installed outdoors (in the open) and both tanks are vented to atmosphere via vent pipes that extend 7 m above ground level.

The mixing and storage tanks are enclosed vessels installed on a plinth in a competent foundation that ensures they stand above any ponded water and the tank vent designs are such that water ingress cannot occur under normal weather conditions. The cyanide reagent area is contained within the secured boundaries of the processing plant and has additional fencing around the secondary containment.

The cyanide unloading, mixing and storage area is located away from areas where acids, strong oxidisers and explosives are stored. No food products of any sort are kept within the reagent storage area or processing plant.

#### Standard of Practice 3.2

Operate unloading, storage and mixing facilities using inspections, preventive maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.

	☐ IN FULL COMPLIANCE	
The operation is	☐ IN SUBSTANTIAL COMPLIANCE with	Standard of Practice 3.2.
	☐ NOT IN COMPLIANCE	

Based on the findings of the audit the operation is fully compliant with Standard of Practice 3.2.

Cyanide briquettes are delivered to site in Orica isotainers. The cyanide is sparged on-site by the delivery driver and empty isotainers are returned to Orica on the same vehicle. These isotainers are specifically designed by Orica for transporting and sparging cyanide briquettes. As such, they are not used for any other purpose.

A procedure is in place for the operation of all valves and couplings for mixing the cyanide into liquid form and the subsequent cleaning of them subsequent to sparging.

The design and handling of the cyanide isotainers is such as to minimise the risk of rupturing or puncturing. The isotainers are not stacked more than one high as specified by a procedure.

A procedure is in place and implemented to clean any cyanide residue from the outside of cyanide containers that are returned to the vendor and securely close them for shipment.

Procedures are in place and implemented to prevent exposures and releases during cyanide unloading and mixing activities. This is addressed in the site's Cyanide Unloading, Mixing and Storage and Responding to Spill Containing Cyanide procedures, which also contain the use of appropriate PPE. Cyanide unloading is undertaken by personnel equipped with appropriate PPE and subject to observation by a second individual from a safe area and by video feed to the control room. Colourant dye is added to the cyanide isotainers when filled at the Orica production facility in Yarwun.





### PRINCIPLE 4 – OPERATIONS

Manage cyanide process solutions and waste streams to protect human health and the environment.

#### Standard of Practice 4.1

Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventive maintenance procedures.

	☐ IN FULL COMPLIANCE	
The operation is	☑ IN SUBSTANTIAL COMPLIANCE with	Standard of Practice 4.1
	☐ NOT IN COMPLIANCE	

Based on the findings of the audit the operation is in Substantial Compliance with Standard of Practice 4.1.

The operation has a range of written management and operating plans in place to manage cyanide facilities. Operating management plans and procedures were developed and continue to be used for the safe operation in all cyanide related activities, covering unloading and storage facilities, leach circuit, cyanide destruct and tailings impoundments.

The approval conditions for the mine establish regulatory requirements to prevent or control cyanide releases and exposures. These include a requirement that there be no discharge from the site and that regulatory limits in place for WAD CN levels at the compliance monitoring point are not exceeded.

The operation has plans and procedures that describe the standard practices necessary for the safe and environmentally sound operation of the facility, including the specific measures needed for compliance with the Code, such as inspections and preventative maintenance activities.

Water management procedures for key cyanide-containing storages have been developed to retain the storage capacity of these facilities. Operational manuals have been prepared and implemented for tailings facilities and Trigger Action Response Plans have been developed to manage circumstances that are critical to the safe and stable operation of these facilities. The Cyanide Management Plan includes prescriptions for the management of freeboard in the tailings storage facilities and the concentrations of cyanide permitted to be discharged to these facilities. The operation has developed the decontamination and decommissioning plans which describe how cyanide would be managed in the event of a temporary closure or cessation of operations.

The operation has implemented a Management of Change procedure which identifies when changes in a site's processes or operating practices may increase the potential for the release of cyanide and which requires the necessary release prevention measures to be implemented as appropriate.

Cowal Gold Operations (CGO) generally has implemented processes to ensure inspection of cyanide facilities on an established frequency sufficient to assure and document that they are functioning within design parameters. However, CGO did not include the float tails leach (FTL) facility in its monthly area inspection program for the full period of its operation. The FTL was





commissioned in January 2019 but scheduled monthly inspections did not include the FTL area until the scope of the Planned Maintenance Work Order was changed in May 2021. Daily prestart checks and preventive maintenance were conducted but area inspections for the FTL were completed for May, June and July 2021 only and are scheduled to continue. All other area inspections had been completed in accordance with the scheduled work orders. The basis of the substantial compliance finding has considered the following:

- The operation has continued to undertake regular inspections of all other cyanide facilities in accordance with its scheduled program. The failure to include the Operational Inspections for the FTL in the existing program was an oversight in the update of the Planned Inspection system following commissioning of the FTL. CGO has demonstrated a good faith effort to comply with this standard of practice.
- The deficiency was corrected in May 2021 and CGO has complied with the revised inspection scope that includes the FTL for May, June and July 2021.
- The deficiency did not result in an immediate or substantial risk to health, safety or environment.

Records are maintained of all inspections, calibration and maintenance activities including corrective actions when identified. The preventative maintenance system at CGO requires scheduled inspection activities for cyanide related work areas, equipment and facilities, including: tanks holding cyanide solution; secondary containments; leak detection and collection systems; pipelines, pumps and valves, and; ponds and impoundments. The operation continues to implement preventative routine maintenance programs for cyanide pumps, pipelines and the cyanide destruction equipment to ensure that equipment functions in accordance with the operational plans and regulatory requirements.

Inspections are carried out on a frequency sufficient to verify that cyanide facilities are operating within design parameters. The operation maintains and periodically tests an emergency power generator that is sufficient to operate pumps and other equipment to prevent unintentional releases in the event of a failure of the primary power supply.

### **Standard of Practice 4.2**

Introduce management and operating systems to minimise cyanide use, thereby limiting concentrations of cyanide in mill tailings.

	☐ IN FULL COMPLIANCE	
The operation is	$\hfill \square$ IN SUBSTANTIAL COMPLIANCE with	Standard of Practice 4.2.
	☐ NOT IN COMPLIANCE	

Based on the findings of the audit the operation is fully compliant with Standard of Practice 4.2.

CGO has conducted and continues to conduct an extensive program to determine optimum cyanide additional rates and revises these addition rates in response to changes in ore types and processing variables. The operation has undertaken feasibility study leach test programs on ore from proposed expansions to identify metallurgical characteristics and potential changes to cyanide addition rates. The mine has evaluated a number of control strategies for cyanide additions including the use of controlled cyanide addition which is linked to automatic free cyanide and WAD cyanide analysers within the leach circuit and ongoing calibration and verification using manual sampling methods. Free and WAD cyanide levels are monitored in the process plant to





provide information relevant to process control and cyanide destruction. The in line Free cyanide analysis is set up to automatically control cyanide addition to the leach circuit. CGO continues to implement its control strategy for cyanide addition. The dosage rate is reviewed by the site metallurgist in conjunction with bottle rolls and may be altered to maintain a suitable level of free cyanide in the leach circuit. This control strategy has been loaded into the Distributed Control System and automatically adjusts the cyanide addition flow rate.

#### Standard of Practice 4.3

Implement a	comprehensive	water	management	program t	to protect	against	unintentio	nal
releases.								

	☐ IN FULL COMPLIANCE	
The operation is	☐ IN SUBSTANTIAL COMPLIANCE with	Standard of Practice 4.3.
	□ NOT IN COMPLIANCE	

Based on the findings of the audit the operation is fully compliant with Standard of Practice 4.3.

The comprehensive and probabilistic water balance is implemented using a model designed for CGO that applies an industry standard modelling tool. The model is run on a regular basis to allow for the successful estimation of water movements and avoidance of overtopping of ponds and tailings storage facilities. Model input data, including site specific weather data is regularly updated.

The mine Water Balance considers appropriate input parameters including:

- The statutory operational freeboard requirements for water storage at CGO, including TSF's;
- The inflows including the rate of tailings discharge, rainfall run-off within the upstream catchment and process water inflows;
- The design criteria storm event durations and return periods as specified in the Water Storage Facilities Operation Procedure;
- The rate of seepage;
- Inflows from drain down that may occur in a power outage; and
- The measured climatic conditions onsite, including evaporation and rainfall rates.

The mine's operating procedures incorporate inspection and monitoring activities to implement the water balance and prevent overtopping of ponds and impoundments and unplanned discharge of cyanide solutions to the environment.

Ponds and impoundments are designed and operated with adequate freeboard above the maximum design storage capacity determined to be necessary from water balance calculations and by regulatory requirements.

#### Standard of Practice 4.4

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

	☐ IN FULL COMPLIANCE	
The operation is	☐ IN SUBSTANTIAL COMPLIANCE with	Standard of Practice 4.4

Merident



Ш	NOT	ΙN	COMPL	IANCE

Based on the findings of the audit the operation is fully compliant with Standard of Practice 4.4.

The operation does not have open waters where Weak Acid Dissociable cyanide (WAD CN) exceeds 50 mg/L. The operations Development Consent approval from New South Wales (NSW) Environmental Protection Authority (EPA) has strict limits enforced for discharge of WAD CN to the TSF. These limits are:

- 20 mg/L WAD CN (90th percentile averaged over 6 months); and
- 30 mg/L WAD CN (100th percentile never to exceed)

Since the previous recertification audit, the operation has expanded its TSF to the new IWL which includes the original TSF cells. Deposition of tails to the new cell within the IWL is now occurring and the previous TSF cells are no longer used. The operation monitors WAD CN levels on a daily basis from the control point at the end of the cyanide destruct circuit prior to discharge to the IWL. These results are located on the operations website as publicly available. The operation has not exceeded the regulatory limits for the duration of the audit period.

WAD CN concentrations in open waters at Cowal are less than 30 mg/L in accordance with approval conditions. This limit is effective in preventing wildlife mortality. This recertification audit confirmed that there have been no wildlife deaths at Cowal attributed to cyanide related impacts during the period since the last recertification audit.

The operation inspects the TSF facility twice daily for the presence of wildlife and mortality in accordance with procedures. A register of wildlife deaths at Cowal is maintained by the operation. The audit observed that these inspections were being conducted at the required intervals.

The operation has engaged an expert external consultant to conduct independent 6 monthly TSF wildlife use pattern reports to monitor any change in wildlife movement or use in the area that may indicate increased risk to wildlife from Cowal's operations. These continued during the recertification audit and were observed to be available on-site.

#### Standard of Practice 4.5

Implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.

	☐ IN FULL COMPLIANCE	
The operation is	☐ IN SUBSTANTIAL COMPLIANCE with	Standard of Practice 4.5.
	☐ NOT IN COMPLIANCE	

Based on the findings of the audit the operation is fully compliant with Standard of Practice 4.5.

Based on evidence observed it has been determined that Cowal does not have a direct discharge to surface water. Lake Cowal is immediately adjacent to the mining operation and is an ephemeral water body. Within the mining lease there are some small ephemeral drainage lines.





The site is designed such that all water within the site operations area (and therefore potentially contaminated) drains internally towards a range of catchment dams. Water outside of the mine operations is diverted by surface water drainage features around the perimeter of the site.

The operation does not have an established mixing zone nor does it have a direct discharge to surface water. Based on evidence reviewed during the audit, the operation does not have an indirect discharge to surface water.

#### Standard of Practice 4.6

Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of ground water.

	☐ IN FULL COMPLIANCE	
The operation is	$\hfill \square$ IN SUBSTANTIAL COMPLIANCE with	Standard of Practice 4.6.
	☐ NOT IN COMPLIANCE	

Based on the findings of the audit the operation is in Full Compliance with Standard of Practice 4.6.

The operation has determined that there are no beneficial users of groundwater in the operational area, other than the water requirements of the operation itself. Specific studies have determined that there are two groundwater aquifers in the area, one shallow and one deeper. There is no connectivity between these two aquifers.

Specific reports conducted to determine groundwater availability for the operation also determined that there are no other users of groundwater identified in the area. This conclusion remains valid at the time of conducting this recertification audit.

The site is designed to capture all runoff within the operation area which is then directed to lined storage dams. All cyanide facilities are constructed with secondary containment in place and the Integrated Waste Landform has seepage collection systems in place.

A groundwater monitoring bore network is located throughout the mine lease and monitoring of water for cyanide is undertaken quarterly. Groundwater monitoring results were reviewed during the audit period with results below limits of detection. Groundwater flow on-site is towards the pit void, as confirmed by external consultant reports.

The Regulatory Authority does not have numerical standards for cyanide in groundwater applied to the operation. The operation does have a requirement to monitor and report WAD CN levels at various locations but no limits have been established. Cowal was observed to be complying with their requirement to monitor and report WAD CN levels in groundwater in the Annual Return and Annual Review to the relevant Regulator.

Cowal is an open pit mining operation and does not utilise underground paste backfill.

#### **Standard of Practice 4.7**

Provide spill prevention or containment measures for process tanks and pipelines.





	IN FULL COMPLIANCE			
The operation is	☐ IN SUBSTANTIAL COMPLIANCE with Standard of Practice 4.7.			
	□ NOT IN COMPLIANCE			
Based on the findings of the	audit the operation is fully compliant with Standard of Practice 4.7.			
and process solution tanks. constructed such that they s	ent measures are provided for all cyanide unloading, storage, mixing The mixing, storage and process tanks have been designed and it on a concrete ring beam with compacted fill in the centre and and asphalt to prevent potential leakage from migrating to the			
Secondary containments for cyanide unloading, storage, mixing and process tanks are sized to hold a volume greater than that of the largest tank within the containment and any piping draining back to the tank, and with additional capacity for the design storm event. The mixing and storage tanks are in a concrete bunded area, the volume of which is significantly more than 110% of the combined volume of the two storage tanks. The bunding surrounding the leach and adsorption tanks is capable of storing two of the largest leach tanks, which exceeds the volume required by the Code. This area also includes the cyanide destruction circuit, and is adequately sized to include this feature.				
cyanide solution or cyanide or areas. Secondary containment	being implemented to prevent discharge to the environment of contaminated waters that are collected in the secondary containment nt areas have been built with dedicated sump pumps and piping to into the processing plant for reuse.			
	s tanks without secondary containment. Spill prevention or rovided for all cyanide solution pipelines to collect leaks and prevent			
•	anide pipelines present a risk to surface water. Cyanide tanks and materials compatible with cyanide and high pH conditions.			
	uality assurance procedures to confirm that cyanide facilities are epted engineering standards and specifications.			
	IN FULL COMPLIANCE			
The operation is	IN SUBSTANTIAL COMPLIANCE with Standard of Practice 4.8.			
	□ NOT IN COMPLIANCE			
Based on the findings of the 4.8.	audit the operation is in Full Compliance with Standard of Practice			

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Quality assurance and quality control programs have been applied to all construction and modification works, addressing the suitability of materials, their fabrication and installation. Quality control and assurance records for all cyanide construction and modifications that have



occurred since the original CGO certification in 2007 have been retained. Examples examined during the audit covered the installation of the Float Tail Leach circuit and the ongoing development of tailings storage at CGO. These works were subject to design review, construction QA/QC and post construction inspection by appropriately qualified persons.

#### Standard of Practice 4.9

Implement monitoring programs to evaluate the effects of cyanide use on wildlife and surface and ground water quality.

	☐ IN FULL COMPLIANCE	
The operation is	☐ IN SUBSTANTIAL COMPLIANCE with	Standard of Practice 4.9.
	□ NOT IN COMPLIANCE	

Based on the findings of the audit the operation is in Full Compliance with Standard of Practice 4.9.

CGO has a range of written documentation including manuals, plans, procedures and work instructions, outlining how monitoring is to be conducted on site. Appropriately qualified personnel have developed site sampling and analytical procedures including a combination of external consultants and site staff, all appropriately qualified to develop the types of documents in use.

The monitoring plans and procedures reviewed during the audit contain the specific details of where samples are taken, sample preservation, chain of custody, sample transport procedures and the parameters to be measured.

Sampling conditions are recorded on field checklists utilised at CGO. This data was observed being recorded on surface water, groundwater and IWL inspection sheets during the audit. CGO monitors for cyanide in both surface water and groundwater locations around the site and these records were reviewed during the audit.

The operation continues to inspect for and record all wildlife mortalities on site, as required under its Development Consent approval. Fauna deaths within the audit period have not been attributable to cyanide. Monitoring is conducted at appropriate frequencies to allow any changes needed to be identified in a timely manner. These documents were required as a result of granting of operating approvals and the monitoring frequency required by the regulatory authorities was approved in these documents.





# PRINCIPLE 5 - DECOMMISSIONING

Protect communities and the environment from cyanide through development and implementation of decommissioning plans for cyanide facilities.

#### Standard of Practice 5.1

Plan	and	implen	nent	proce	dures	for	effective	decomr	nissioning	of the	cyanide	facilities	to	protect
hum	an h	ealth, \	vildlif	fe and	d lives	tock	ζ.							

The operation is	<ul> <li>IN FULL COMPLIANCE</li> <li>IN SUBSTANTIAL COMPLIANCE with Standard of Practice 5.1.</li> <li>□ NOT IN COMPLIANCE</li> </ul>
	INOT IN COMPLIANCE
Based on the findings of 5.1.	f the audit the operation is in Full Compliance with Standard of Practice
Decommissioning of cya overall Cowal Gold Mine	loped written procedures to decommission cyanide facilities. anide facilities is captured in two primary documents, these being the - Mine Closure Plan (MCP) and the specific Cowal Gold Mine ecommissioning Plan (DDP) – Processing Facilities.
requirements, processes The DDP was last updat	ntly updated in May 2021. This document covers overall mine closure is and costs, of which the decommissioning of cyanide facilities is part. Ited in March 2021. Specifically, the DDP was prepared for the processing cyanide infrastructure. The DDP includes an implementation schedule.
Cowal on an annual bas states that it shall be re	ts procedures and updates them as needed. The MCP is now reviewed by is. The DDP itself was recently revised in March 2021. The document wiewed at least every 5 years or when major changes occur in the process aded the new additions to the processing plant in its recent update.
Standard of Practice ! Establish an assurance ! activities.	<b>5.2</b> mechanism capable of fully funding cyanide related decommissioning
	IN FULL COMPLIANCE
The operation is	IN SUBSTANTIAL COMPLIANCE with Standard of Practice 5.2.
	☐ NOT IN COMPLIANCE

Based on the findings of the audit the operation is in Full Compliance with Standard of Practice 5.2.

The operation has developed an estimate of the costs to fully fund third party implementation of its DDP. The costs presented in the DDP are for an external contractor to undertake decommissioning works. This estimate is included in the overall site closure cost model, updated annually by an external consultant. Overall closure costs were recently updated as part of the overall MCP revision.

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Overall mine closure costs, including the DDP costs, are reviewed on an annual basis as part of the MCP review. This was evidenced through the recent revision of costs for both the DDP and MCP in 2021.

The operation has established a mechanism approved by the applicable jurisdiction to fully fund the costs of cyanide decommissioning activities. Cowal has commissioned a bank guarantee to cover the overall costs of mine closure. The Department of Resources and Energy (DRE) hold these bank guarantees for the full amount in the event that the operation is forced to close.





### PRINCIPLE 6 – WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

#### Standard of Practice 6.1

Identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them.

	☐ IN FULL COMPLIANCE	
The operation is	☐ IN SUBSTANTIAL COMPLIANCE with	Standard of Practice 6.1
	☐ NOT IN COMPLIANCE	

Based on the findings of the audit the operation is in Full Compliance with Standard of Practice 6.1.

The operation has developed procedures describing how cyanide related tasks such unloading, mixing, plant operations, entry into confined spaces, and equipment decontamination prior to maintenance. In particular these include:

- Cyanide Unloading, Mixing and Storage.
- Confined Space.
- Isolation.
- Incident and Investigation.
- Daily Tailings Storage Facility Inspection.
- Fixed Plant Cyanide Decontamination.
- SMBS Cyanide Destruct Sulphides Controlling WAD Cyanide Discharge Levels.
- Mobile Equipment Cyanide Decontamination.

In addition to this, there are numerous safe work instructions which describe how work is to be undertaken safely onsite.

The system has a key requirement for risk assessments to be completed for all task and jobs. These risk processes drive the requirement for the use of PPE. The procedures for Safe Work Instructions (SWIs), Job Hazard Analysis (JHA)s and take 5s provided require personnel to don appropriate personal protective equipment (PPE).

The operation has developed and implemented a change management process. This incorporates a procedure and an associated change management form. The process has a strong focus on risk and the form requires a risk assessment. Procedures are in place to review proposed process and operational changes and modifications for their potential impacts on worker health and safety and incorporate the necessary worker protection measures.

The operation solicits and actively considers worker input in developing and evaluating health and safety procedures. This was confirmed during the site audit through a review of records and interviews with employees.

#### Standard of Practice 6.2

Operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.

MBoundertt



	$\boxtimes$	IN FULL COMPLIANCE	
The operation is		IN SUBSTANTIAL COMPLIANCE with	Standard of Practice 6.2.
		NOT IN COMPLIANCE	

Based on the findings of the audit the operation is in Full Compliance with Standard of Practice 6.2.

The operation has determined the appropriate pH for limiting the evolution of HCN. Cyanide is dissolved, by sparging, in the delivered isotainer. A pH level of 11.0 or greater is targeted during mixing. Associated instrumentation is in place to monitor and manage this process. This also includes targets for pH in the leach tanks as the cyanide progresses through the circuit.

Where the potential exists for significant cyanide exposure, the operation does use both fixed and personal monitoring devices to confirm that controls are adequate to limit worker exposure to HCN gas.

Standard operating procedure have been developed that outline the actions to be taken if a HCN reading is detected at either 4.7 or 10 ppm. Clear actions are identified in this procedure for employees to take at both these levels. The operation has identified areas and activities where workers may be exposed to cyanide in excess of 10 ppm and require use of PPE in these areas or when performing these activities.

Portable and fixed HCN monitors are maintained, tested and calibrated as per manufacturer requirements and these records are available on-site. Warning signs have been placed in areas identified as being at high risk of being exposed to cyanide. The signs state that cyanide is present, and that smoking, open flame and eating and drinking are not permitted. Signage is present indicating the specific PPE that must be worn when entering the area.

The supplier Orica has historically included dye in the product. The audit visual inspection confirmed that product in use does contain dye. Showers, low-pressure eyewash stations and dry-powder fire extinguishers are strategically located throughout the operation in the cyanide areas, and are maintained, inspected and tested on a regular basis. The inspection and record review conducted during the site audit confirmed this.

The site inspection confirmed that unloading, storage, process tanks and piping containing cyanide are identified to alert workers of their contents, and the direction of cyanide flow in pipes designated.

SDS and first aid instructions were posted at all designated cyanide areas in weatherproof pouches. SDS were available in the control room, emergency response centre, near the reagents yard, in the processing office and online in the chemical management database.

Procedures are in place, to investigate and evaluate cyanide exposure incidents to determine if the operation's programmes and procedures to protect worker health and safety, and to respond to cyanide exposures, are adequate or need revising. Incident records were reviewed during the audit, which demonstrated significant action to prevent recurrence.





#### Standard of Practice 6.3

Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

	☐ IN FULL COMPLIANCE	
The operation is	☐ IN SUBSTANTIAL COMPLIANCE with	Standard of Practice 6.3.
	☐ NOT IN COMPLIANCE	

Based on the findings of the audit the operation is fully compliant with Standard of Practice 6.3.

The site inspection indicated that the operation does have water, oxygen, a resuscitator, antidote kits and a radio, telephone and alarm system for communication and readily available for use at cyanide unloading, storage and mixing locations.

The operation inspects its first aid equipment regularly to ensure that it is available when needed, and materials are stored and/or tested as directed by their manufacturer. The operation has two cyanide antidote kits (cyanokit) that are held in the medical room on-site. These were observed to be in date and inspected on a regular basis, as specified in procedures. The audit found that defibrillation and resuscitation kits were inspected as specified in procedures.

A review of the inspection records indicates that the site's first aid equipment is inspected in accordance with the stipulated frequencies. The inspections include presence and serviceability of the equipment.

The operation has developed and implemented a site-specific Emergency Preparedness and Response Plan - Surface (EPRP) to respond to cyanide incidents. The EPRP clearly defines the procedures for providing first aid in the event of a cyanide exposure.

The operation does have its own on-site capability to provide medical assistance to workers exposed to cyanide, comprised of a full coverage on each shift of suitably trained emergency response team members . Procedures have been developed to transport workers exposed to cyanide to locally available qualified off-site medical facilities utilising the NSW ambulance service, who are aware of this requirement.

The operation has made formalised arrangements with the West Wyalong Hospital to ensure it is aware of the potential need to treat patients for cyanide exposure. This arrangement has recently been reconfirmed by all parties. CGO undertake cyanide related mock drills to test response procedures for a variety of different cyanide related exposure scenarios. Lessons learnt are observed to be included into future exercise planning and revision of procedures.





# **PRINCIPLE 7 - EMERGENCY RESPONSE**

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

response strategies and t	apabilities.
<b>Standard of Practice 7.1</b> Prepare detailed emergency	response plans for potential cyanide releases.
The operation is	<ul> <li>IN FULL COMPLIANCE</li> <li>IN SUBSTANTIAL COMPLIANCE with Standard of Practice 7.1.</li> <li>NOT IN COMPLIANCE</li> </ul>
Based on the findings of the	audit the operation is fully compliant with Standard of Practice 7.1.
accidental released of cyanic	rgency Preparedness and Response Plan (EPRP) to address potential de. There was a significant review of the suite of emergency response udit period resulting in a simplified document structure for emergency
cyanide emergencies. The Ir plan. The EPRP also covers	d response equipment, responsibilities, and procedures for anticipated acident Management Team (IMT) is trained in the contents of this numerous different emergency scenarios including hazardous ement actions to be taken in the event of an emergency. This ting to cyanide.
	ential cyanide failure scenarios and potential events appropriate for the ronmental, safety and operating circumstances, as required by this neap leach facility.
The EPRP describes the inter	ocesses at CGO include response to transport related emergencies. Faction between the cyanide transporter and the site in relation to in the event of a transportation accident.
·	response actions (as appropriate for the anticipated emergency site personnel from the area of exposure, use of cyanide antidotes
points and subsequent remo The EPRP Attachment 10 de	s by which site personnel are evacuated to appropriate site muster eval of site personnel from the mine site if required. tails the first aid procedure to be followed in the event of a cyanide antidotes are administered by medical practitioners only.
Standard of Practice 7.2 Involve site personnel and s	takeholders in the planning process.
The operation is	<ul><li>IN FULL COMPLIANCE</li><li>IN SUBSTANTIAL COMPLIANCE with Standard of Practice 7.2.</li></ul>

Mercdedt



□ NOT IN COMPLIANCE
Based on the findings of the audit the operation is fully compliant with Standard of Practice 7.2.
The eneration has involved its workforce and stakeholders, including notentially affected

The operation has involved its workforce and stakeholders, including potentially affected communities, in the cyanide emergency response planning process.

Emergency procedures and plans are reviewed regularly, with the most recent change being the amalgamation of previous emergency response documents into the EPRP. The workforce is consulted regarding cyanide use and emergency response procedures through regular Health and Safety representative meetings. Selected personnel from each department attend these meetings.

Cyanide emergency response capability is discussed with local communities through the Community and Environmental Monitoring Consultation Committee (CEMCC) meetings. Local emergency services are also consulted on aspects of the EPRP during Local Emergency Management Committee (LEMC) meetings that mine personnel attend. CGO has involved response agencies in cyanide emergency planning and response process. The LEMC consists mainly of Police, NSW Fire, Rural Fire, Department of Primary Industries (DPI), Hospital, Ambulance, Shire Council, SES, Essential Energy. There is strong communication with this group with 6 monthly meetings and CGO personnel representation.

The EPRP is updated regularly, with the major update occurring in October 2020. Consultation and communication with stakeholders regarding updates was observed during the audit.

#### Standard of Practice 7.3

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

response.		
	IN FULL COMPLIANCE	
The operation is	☐ IN SUBSTANTIAL COMPLIANCE with	Standard of Practice 7.3.
	☐ NOT IN COMPLIANCE	

Based on the findings of the audit the operation is fully compliant with Standard of Practice 7.3.

The EPRP designates appropriate personnel and commits necessary equipment and resources for emergency response. The EPRP describes the roles and interactions in an emergency. This includes details of the role within the incident management team (IMT) including the Emergency Controller and defines who can carry out this role in an emergency. As such, there are a number of people who are trained in the role of Emergency Controller.

The Mine operates four Emergency Response Teams (ERT) teams, with one team on duty per shift. ERT team members and their contact details are listed in the Cowal Gold Mine Emergency team list, including after hours and 24-hour contact details and methods.

The EPRP details the training and evaluation requirements in Section 11. The operation has ERT teams based on rosters and organised into panels. The training matrix for each of the ERTs was sighted. Call out procedures for activation of the ERT for a cyanide emergency are included in the EPRP.





The EPRP details responsibilities for all emergency responders. Duty cards are included within the EPRP (Section 41). The required emergency response equipment is detailed in Section 13 and Appendix F of the EPRP. The Mine inspects their emergency response equipment as described in the EPRP monthly and evidence is available to support this.

The EPRP includes required interaction with external Emergency Services and also deals with handover control to the emergency services and includes their areas of responsibility throughout the document. The operation has confirmed that outside entities are included in the EPRP and are aware of their involvement and are included as necessary in mock drills or implementation exercises.

Standard of Practice 7.4 Develop procedures for inte	ernal and external emergency notification ar	nd reporting.
The operation is	<ul><li>IN FULL COMPLIANCE</li><li>IN SUBSTANTIAL COMPLIANCE with</li><li>NOT IN COMPLIANCE</li></ul>	Standard of Practice 7.4.
Based on the findings of the	e audit the operation is fully compliant with	Standard of Practice 7.4.
agencies, outside response	res and contact information for notifying ma providers and medical facilities of the cyan external agencies will be requested from the	ide emergency.

Included in the plans are notification of authorities and neighbours, interaction with emergency services and public relations and debriefing of stakeholders. The responsibilities for this are included in the duty cards.

The EPRP clearly describes the use of the incident management team that has the Duty Manager as the lead. This includes trigger cards that include communication externally, to corporate entities, affected communities, media and to the public.

#### Standard of Practice 7.5

only with direct consultation with the IMT.

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

	☐ IN FULL COMPLIANCE	
The operation is	☐ IN SUBSTANTIAL COMPLIANCE with	Standard of Practice 7.5
	☐ NOT IN COMPLIANCE	

Based on the findings of the audit the operation is fully compliant with Standard of Practice 7.5.

The EPRP and related processing SWIs do describe specific remediation measures as appropriate for the likely cyanide release scenarios, such as:

- Recovery or neutralisation of solutions and solids
- Decontamination of soils or other contaminated media





- Management and/or disposal of spill clean-up debris
- Provision of an alternate drinking water supply (not a credible scenario).

Considerations are made within the EPRP and associated SWIs for ground remediation and neutralisation with ferrous sulphate only for all relevant scenarios. This includes the analysis to be performed to determine the accepted value of the final concentration of residual cyanide in the soil. These documents also state that neither reagent be used if there is a risk of contaminating water bodies.

The emergency documentation also identifies the need for environmental monitoring to identify the extent and effects of a cyanide release, and include sampling methodologies, parameters and, where practical, possible locations.

#### Standard of Practice 7.6

Standard of Practice	7.0	
Periodically evaluate res	sponse procedures and capabilities and revise t	hem as needed.
The operation is	☐ IN FULL COMPLIANCE ☐ IN SUBSTANTIAL COMPLIANCE with ☐ NOT IN COMPLIANCE	Standard of Practice 7.6.

Based on the findings of the audit the operation is in Substantial Compliance with Standard of Practice 7.6.

The Emergency Preparedness and Response Plan (EPRP) includes the required provisions to review on an annual basis or after an event which required its activation. Evidence of this review was available at the operation.

The EPRP suggests a full "site facilitated emergency response scenario once per year". The operation has conducted numerous internal drills relating to cyanide that test the EPRP and subsequent response scenarios described within the document through ERT and processing training events. A full EPRP drill was conducted in February 2021 which involved a full site evacuation. However, only one full site facilitated emergency response drill had been conducted in the audit period.

Drill records indicated that post drills (or events) there is a review. This includes an assessment of the plans. The drill records indicated that after the drill review that action lists are developed and implemented. No cyanide related events occurred during the audit period that required the activation of the EPRP.

Given that the site does undertake other forms of emergency drills and training, the impacts of the COVID-19 pandemic on site operations in 2020 and that one full site drill was undertaken in 2021 within the audit period, the operation is found to be in substantial compliance with this audit protocol. A Corrective Action Plan has been developed by the operation to rectify this finding. In making this determination it was noted that:

- Cowal had shown a good faith effort to comply by undertaking emergency response drills and post-drill debriefings, as well as planning to undertake further out of cycle drills in 2021;
- The deficiency is readily correctable within one year; and
- The deficiency does not represent an immediate risk to personnel or the environment.





# **PRINCIPLE 8 - TRAINING**

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

<b>Standard of Practice 8.1</b> Train workers to understand	the hazards associated with cyanide use.
The operation is	<ul> <li>IN FULL COMPLIANCE</li> <li>IN SUBSTANTIAL COMPLIANCE with Standard of Practice 8.1.</li> <li>□ NOT IN COMPLIANCE</li> </ul>
Based on the findings of the 8.1.	audit the operation is in Full Compliance with Standard of Practice
The operation utilises the tra This database was introduce During the changeover of sy exercise to map the compete	personnel who may encounter cyanide in cyanide hazard recognition. Inining database INX Intuition to manage their training requirements. In the audit period and replaced the previous system. It is stems, the operation conducted a Training Needs Analysis (TNA) ency requirements for each worker position. The mapping of positions are ewed during the audit and found to be suitable for the requirements
Site Induction. This includes	site but do not work in the processing area are subject to a General information on hazardous chemicals held on-site, including cyanide is refreshed every two years.
escorted by an inducted pers session on the hazardous ch In addition to this, workers o requirement if undertaking t	ng the processing area must complete the Processing Induction (or be son) regardless of their work type. This includes an information emicals that are likely to be encountered on-site, including cyanide. complete the Cyanide Awareness presentation as a minimum the Processing Induction. This presentation addresses exposureing, first aid and safe handling. Refresher training is scheduled to be
Cyanide training records are	retained by CGO for all training.
	to operate the facility according to systems and procedures that ommunity and the environment.
The operation is	<ul> <li>IN FULL COMPLIANCE</li> <li>IN SUBSTANTIAL COMPLIANCE with Standard of Practice 8.2.</li> <li>NOT IN COMPLIANCE</li> </ul>

Metadet

Based on the findings of the audit the operation is in Full Compliance with Standard of Practice

8.2.



The operation trains workers to perform their normal production tasks, including unloading, mixing, production and maintenance, with minimum risk to worker health and safety and in a manner that prevents unplanned cyanide releases.

The operation has a tiered induction process that needs to be completed prior to working with cyanide. More detailed on the job training is delivered through a one-on-one session with their Shift Supervisors, as directed by the applicable Training Plans, e.g. Reagents Training Plan. The Training Plans reference each of the relevant procedures in which the trainee is required to be trained. The training packages that are followed include a theory section, a Standard Operating Practice (SOP) section and an associated questionnaire as well as a verification of competency by the trainer assessor.

The training elements necessary for each job involving cyanide management are identified in training materials. Within the training system, the training requirements for each job are identified in specific Training Plans that must be completed before the employee is deemed fully competent in their role. A range of core modules are common to many jobs and other modules are task or role specific.

Appropriately qualified personnel provide task training related to cyanide management activities and employees are trained prior to working with cyanide through the induction process. Refresher training on cyanide management is provided to ensure that employees continue to perform their jobs in a safe and environmentally protective manner.

The induction process is tested using written assessments. The answers to these assessments and any discrepancies are discussed with the trainee prior to being deemed competent. The training packages are based on one-on-one task training in SOPs with the Shift Supervisor completing formal workplace assessments including visually observing an operator performing a task prior, verbal and written assessment prior to signing them off as competent using the procedure signoff sheet. Records for all training conducted on-site are captured and recorded in the INX database and electronic copies retained on the server as back-up. These records include the information required by this Standard of Practice.

#### Standard of Practice 8.3

Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.

	☐ IN FULL COMPLIANCE	
The operation is	$\hfill \square$ IN SUBSTANTIAL COMPLIANCE with	Standard of Practice 8.3.
	□ NOT IN COMPLIANCE	

Based on the findings of the audit the operation is fully compliant with Standard of Practice 8.3.

Cyanide unloading, mixing, production and maintenance personnel are trained in the procedures to be followed if cyanide is released. Processing workers are trained in responding to a release of cyanide, including raising the alarm, as part of the cyanide worker package and a cyanide awareness PowerPoint presentation. The response process is also available in the mill control room.



Signature of Lead Auditor



Response to worker exposures or catastrophic releases of cyanide is responsibility of the ERT and emergency management team. Workers that are not part of the ERT are not expected to respond to cyanide emergencies other than through raising the alarm and following evacuation procedures if necessary. This is described in the procedures. EROs and ERT members receive training in the procedures contained within the EPRP regarding cyanide, including the use of necessary response equipment. The Incident Management Team has also received dedicated training in their roles.

Principles of first aid and decontamination are provided within the cyanide awareness presentations that are completed by all personnel working in the processing plant area. The ERT are the primary responders to cyanide emergencies including worker exposures. The ERT are trained to nationally recognised competency frameworks. In addition, ERT members undergo inhouse training in appropriate elements of the EPRP, including equipment use, spill clean-up and decontamination and first aid. Mock emergency drills are conducted periodically as part of the response evaluation process. They cover both worker exposure and environmental releases. The operation has conducted mock cyanide drills involving ERT response to cyanide exposures and spills and evaluation of these drills is undertaken. Emergency drills are evaluated from a training perspective to determine if personnel have the knowledge and skills required for effective response. Refresher training is provided and records of this training were available for review during the recertification audit.





# **PRINCIPLE 9 - DIALOGUE**

Engage in public consultation and disclosure.

<b>Standard of Practice 9.1</b> Provide stakeholders the op	portunity to communicate issues of concern.
The operation is	<ul> <li>IN FULL COMPLIANCE</li> <li>IN SUBSTANTIAL COMPLIANCE with Standard of Practice 9.1.</li> <li>NOT IN COMPLIANCE</li> </ul>
Based on the findings of the 9.1.	audit the operation is in Full Compliance with Standard of Practice
_	pportunities for stakeholders to communicate any issues of concern. ommunity complaints line, which is active and advertised in local
Consultation Community Ce	nity centre located on the main street of West Wyalong (Evolution ntre) which is open 2-3 days week for members of the public to of information on the mine, and is staffed by Evolution employees. the complaints process.
representatives of local compublicly available through the	ental Monitoring Consultative Committee (CEMCC) include munities and meets quarterly. The complaints register is made to Evolution Cowal website. There have been no complaints regarding the mechanism has been established.
COVID-19 pandemic for the	to undertake community open days has been restricted due to the majority of the audit period however such events are planned are lifted. Nevertheless, sufficient other mechanisms are available for the with the operation.
<b>Standard of Practice 9.2</b> Initiate dialogue describing concerns.	cyanide management procedures and responsively address identified
The operation is	<ul> <li>IN FULL COMPLIANCE</li> <li>IN SUBSTANTIAL COMPLIANCE with Standard of Practice 9.2.</li> <li>NOT IN COMPLIANCE</li> </ul>
Based on the findings of the 9.2.	audit the operation is in Full Compliance with Standard of Practice

The operation provides a range of opportunities for interaction with stakeholders on cyanide management practices on-site. The operation employs a Community and External Relations Specialist who is responsible for stakeholder relations at Cowal.

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The operation has a community centre located on the main street of West Wyalong (Evolution Consultation Community Centre) which is open 2-3 days week for members of the public to access. It includes a range of information on the mine, and is staffed by Evolution employees. This includes information on the complaints process.

A Community and Environmental Monitoring Consultative Committee (CEMCC) include representatives of local communities and meets quarterly. The CEMCC representatives are advertised in local newspapers to inform communities of who they may approach with any concerns regarding CGO. The CEMCC meetings include presentation on cyanide management at Cowal. Minutes of meetings are maintained and are published on the Cowal website.

The complaints register is made publicly available through the Evolution Cowal website. There have been no complaints regarding cyanide management since the mechanism has been established. The operation has started meeting with the respective local Shires in 2021 as a group to discuss operational and social issues. Meeting minutes are available to support this.

#### Standard of Practice 9.3

Make appropriate operational and environmental information regarding cyanide available to stakeholders.

	$\boxtimes$	IN FULL COMPLIANCE	
The operation is		IN SUBSTANTIAL COMPLIANCE with	Standard of Practice 9.3
		NOT IN COMPLIANCE	

Based on the findings of the audit the operation is in Full Compliance with Standard of Practice 9.3.

A range of written descriptions has been developed relating to cyanide management on site, which has been made publicly available.

Much of this information is available on the Evolution Cowal website, including the Cyanide Management Plan and associated addendums. Quarterly CEMCC presentations are made available on the Evolution Cowal website. These presentations always contain information relating to cyanide use and management. Cowal periodically publishes community newsletters that provides specific details of environmental management including cyanide management.

Literacy rates are very high in the local population. However, information on cyanide management is provided verbally to CEMCC meetings and on public open days.

The operation has mechanisms in place to make information publicly available on events relating to exposures or releases required by the ICMC, although has not had to do so in the audit period. These mechanisms include public reporting of data to NSW regulatory agencies and publishing the data on their own website.

