FINAL COMPLETION REPORT

Harmony Saaiplaas Gold Plant

Introduction

This Final Completion Report presents the evidence to support the successful implementation of the Corrective Action Plan to correct the deficiencies identified in the ICMI certification audit of Harmony Saaiplaas Gold Plant, held from 8th – 12th March 2010.

Corrective Action Plan - 1

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

Operations Practice 4.1 Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventative maintenance procedures

Deficiencies

 The plant is in the process of implementing a Computerised, Excel spreadsheet based, Planned Maintenance System (PMS). Although the cyanide plant maintenance and inspection schedule covering critical cyanide equipment was sighted, there were insufficient records to evaluate the effective implementation and sustainability of the PMS.

Corrective Actions

• Six months of PMS records and associated documentation to illustrate the sustainability and operational implementation of the PMS.

Evidence presented to Auditors

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

- Evidence that the new DMS2000 computerised Planned Maintenance System (PMS) is in place and operational. This has replaced the previous Excel spreadsheet system and has more added value features contributing to effective planned maintenance.
- Over six months of sampled records which include scheduled maintenance inspections, equipment histories, linked routine and emergency job card records, inspection schedules, all of which demonstrate the operational and continuity status of the PMS.



Corrective Action Plan - 2

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

Training Practice 8.2 Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment.

Deficiencies

• The whole Harmony Group training system was changed from a historically less formal training structure to a formal structured and well planned system, referencing national unit standards relating to metallurgy. Although the old system ensured competency, the process of training the staff in the revised standards and procedures which are Cyanide Code compliant, is in its early stages of retraining. There are currently insufficient records and follow up observations to demonstrate the competency of the staff in the new systems and procedures.

Corrective Actions

• The Harmony Group Training structures, along with the various plant trainers, have planned to complete the training and the appropriate planned task observations within the next eight months.

Evidence presented to Auditors

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

- Samples of signed training attendance registers for various training sessions on the new procedures.
- The Saaiplaas Plant Training Matrix indicating the new procedures and the various dates that individual employees undertook training in the new procedures (including new Standard Operating procedures and the Emergency Procedures).
- Samples of competency assessments and Planned Task Observations (PTOs) of individuals after having undertaken training in the new procedures.



Conclusion

The Lead Auditor, following discussions with the audit team, is satisfied that the corrective actions taken, meet the requirements of the corrective action plans and thus enable substantial compliance in these operations and production practices to be revised to Full Compliance.

Mr

Arend Hoogervorst Lead Auditor

Date: 15th December 2010

