



The CODE

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What's Inside

Cyanide Code
Conference in
Ankara, Turkey

Two Mining
Companies and Six
Transport
Companies Join
Cyanide Code

Tim Ihle Tapped to Be
IAG Vice Chair

Global Reporting
Initiative Proposes
Hydrogen Cyanide
Air Emissions
Reporting at Mines

Auditor's Corner:
Emergency Drills

Welcome to the 1st Quarter 2023 edition of *The Code*.

Cyanide Code Conference in Ankara, Turkey

The [International Cyanide Management Institute](#) and the [Turkish Gold Miners Association](#) jointly hosted a one-day conference in Turkey's capital Ankara that welcomed nearly 300 registered participants. The January 11, 2023, conference included presentations by government ministers, industry officials, and ICMI leadership. The conference was designed to assist participants in their understanding of the responsible management of cyanide and to discuss safe cyanide management with ICMI team members.



About 300 people involved in Turkish mining participated in a recent ICMI-held conference in Ankara.

Opening remarks at the conference were presented by Turkish Gold Miners Association President Mehmet Yilmaz; Cevat Genç, Managing Director of the General Directorate of Mining and Petroleum Affairs of The Republic of Turkey; and ICMI President Paul Bateman. ICMI Senior Vice President Eric Schwamberger and Vice President for Standards Assurance Mark Montoya led the discussions, which focused on the practical issues associated with cyanide management at gold and silver mines and how the Cyanide Code addresses these issues. The conference program also provided attendees with knowledge and understanding of the Cyanide Code's expectations for performance and the measures typically necessary to achieve that performance.



ICMI Senior Vice President Eric Schwamberger co-lead the conference discussions.

The conference was followed by publication of an article, authored by ICMI President Paul Bateman, on the Cyanide Code for the current edition of *MAPEG Dergi*, the semi-annual magazine published by Turkey's [General Directorate of Mining and Petroleum Affairs](#). To read the article, [click here](#).

To foster greater interest in the Cyanide Code by the Turkish gold mining industry, ICMI has commissioned the Turkish language translation of the Cyanide Code's program documents. It is expected that the translations will be posted to the Cyanide Code website in May on the [Languages page](#). The Turkish translation joins English, Spanish, Portuguese, French, and Chinese translations of Cyanide Code program documents. Note that the official language of the program is English, and all documents submitted to ICMI must be written in English.

Two Mining Companies and Six Transport Companies Join Cyanide Code

ICMI welcomes the following signatories:

KOZA
ALTIN İŞLETMELERİ

[KOZA Gold Corporation](#), which operates Ovacik, Cukuralan, Himmetdede, Kaymaz, Mastra and Mollakara gold mines, is the first Turkish company in the history of the Republic of Turkey to realize gold production in the country.

asante
GOLD CORPORATION

[Asante Gold Corporation](#) owns two mines in Ghana, the Chirano and Bibiani mines. The Chirano mine is currently Code-certified, as Asante acquired it from another code signatory, Kinross Gold Corporation, in August 2022.



Zafer Tank Taşıma Ulus Nak is a cyanide transporter based in Istanbul, Turkey. It is part of [Zafer Logistics](#), established in 1998, which serves tank container customers from all sectors with hazardous and non-hazardous transportation services.

LLP Trading and Industrial Company Olimp

LLP Trading and Industrial Company Olimp is a transporter operating in Kazakhstan.



Brisbane, Australia-based [PanAust Ltd.](#) is currently a signatory to the Cyanide Code as a gold mining company, and is now certified as a transport signatory. The company has facilities in Laos, Papua New Guinea, Myanmar and Chile.



[Vehrad SARI](#) operates a cyanide repackaging facility based in Burkina Faso. It is a unit of Vehrad Transport & Haulage in Ghana which serves the West Africa Sub-region with logistics management offering supply, waste disposal, haulage warehousing and storage.



[ProMS LLP](#), based in Kazakhstan, is a cyanide production signatory that operates two cyanide warehouses in Kazakhstan, and supplies other services, including transportation of hazardous material, to mining companies.



Konis Logistic is a cyanide transporter based in the Ivory Coast.



Tim Ihle Tapped to Be IAG Vice Chair

Tim Ihle, [Orica's](#) Global Head of Cyanide, has been tapped to be the Vice Chair of the Cyanide Code's Industry Advisory Group (IAG). The IAG is a forum to advance the education, communication, and discussion about the implementation of the Cyanide Code amongst the program's participating signatory companies.

Mr. Ihle was appointed to his current position at Orica in July 2021 and is responsible for leading the cyanide product category for Orica's global business. Prior to this role, he served for four years in Orica's Strategy and M&A team. His last role in this team was as Head of Corporate Development, where he led the strategy function and several technology M&A deals.

Prior to joining Orica, Mr. Ihle worked as a strategy consultant with L.E.K. Consulting and prior to that worked as an engineer across large infrastructure projects in both technical and project management capacities. He has a Bachelor of Engineering and MBA degrees.

Global Reporting Initiative Proposes Hydrogen Cyanide Air Emissions Reporting at Mines

The Global Reporting Initiative (GRI), an independent organization that provides a framework and standards for companies to voluntarily report their sustainability performance, has proposed Sector Standards for the Mining industry, which have been published as drafts for public comment. [Click here to read the draft proposal titled “GRI Sector Program Mining exposure draft.”](#)

Of note for gold mining industry participants in the GRI, the draft mining sector standards (Section 14.3 – Air Emissions) states: “That many gold operations and refineries use cyanide to extract gold from ore, causing hydrogen cyanide (HCN) to be discharged into tailings storage facilities. HCN, when volatilized into the air, can lead to negative health impacts for people in the immediate proximity of the mine.” Consequently, the draft standard calls for reporting a breakdown of hazardous air-pollutant emissions, including hydrogen cyanide, emitted from tailings storage facilities on a ‘site-specific basis.’

The GRI standards are considered the most widely used standards for reporting sustainability information. Although reporting using the GRI framework and standards is voluntary, many companies use them for ESG reporting, and many external stakeholders examine what companies report.

The draft Standard is open for comment through April 30, 2023.

Auditor’s Corner: Emergency Drills

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.

This edition discusses the Cyanide Code’s expectations for conducting emergency drills to test and evaluate an operation’s planning and procedures for responding to cyanide releases and exposures. It also assesses the training provided to response personnel. The Code’s intent is to ensure that operations are properly prepared to respond to cyanide releases and exposures should they occur. Such incidents are not routine and typically occur very infrequently; thus, it is important that personnel are regularly trained and ready to respond quickly to treat exposure victims and prevent or minimize adverse impacts to the environment.

Emergency drills are important in ensuring that operations are prepared to adequately respond to situations where cyanide is inadvertently released, or where workers are adversely exposed to the chemical. Such drills can make the difference in saving lives, and preventing environmental catastrophe, by properly preparing responders to deal with such possible scenarios. It is important therefore that the auditor assesses the operation’s plans, procedures and capacities to respond to such events swiftly and appropriately, and that the auditor provides clear and complete evidence in audit reports to document their findings.

It is crucial that emergency response drills be designed and conducted to test the entire cyanide emergency response process, from the initial event and emergency callout notification to the close-out of the response process. Drills should test the adequacy of the operation’s response procedures, capabilities, and preparation, including training and equipment availability. This may be accomplished as a single, comprehensive drill, or as multiple drills, each testing different components of the response process. For example, a drill simulating a liquid cyanide release with dermal exposure of a maintenance worker could be conducted as two separate drills; one drill addressing the spill and another drill addressing first aid treatment and medical care.

The frequency of drills for cyanide emergencies must be sufficient to evaluate the operation's plans, training, resources, and preparedness for an appropriate response to cyanide releases and to worker exposures to cyanide. On at least an annual basis, operations should conduct emergency drills that simulate cyanide exposures and releases. Written emergency response plans and procedures for mining, production and transportation operations should include specific provisions for conducting emergency drills, including their frequency.

Operations should not test the same release and exposure scenarios from year to year. During the three-year recertification period, drills should include a variety of potential release scenarios such as release of hydrogen cyanide gas, liquid cyanide, or solid cyanide, and should include a variety of worker exposure scenarios, such as inhalation, ingestion, and dermal exposure, as applicable to the operation.

All personnel that may be expected to respond to cyanide emergencies should participate in drills to confirm that they are able to perform response tasks when required. Drills may need to include not only the on-site emergency response team, but also process and maintenance personnel. If external responders such as fire departments and ambulance services are identified in emergency response plans as having response roles, operations should make these external responders aware of their designated roles, and these entities should be invited to participate in any drill scenarios that would trigger their involvement. This participation can enhance the benefits of the exercise by testing the entire response process, creating a more realistic event, and familiarizing all potential participants with the operation. It is also important that emergency drills be field exercises rather than tabletop exercises and closely simulate actual cyanide release and exposure incidents.

External responders are not always available to participate. However, operations should contact these entities and maintain records to document that the external responders were invited to participate in drills, as evidence for Code auditors. Additional evidence useful in verifying compliance with this requirement may include records of meetings with external responders, confirmation that the operation sent these entities copies of its response plans and procedures, and interviews with on-site and off-site personnel, as well as documentation of drills indicating the parties that participated in the drills.

Operations are also expected to document in drill reports the emergency scenarios, the personnel involved and the response actions taken, and to evaluate the drills conducted to determine the adequacy of the planned response procedures and the training of response personnel. Operations should revise their response plans and training programs for response personnel based on the lessons learned from these emergency simulations.

During Code certification audits, auditors should review records and interview response personnel to confirm that emergency drills:

- 1) are designed and conducted at least annually to sufficiently test emergency preparedness and training;
- 2) address cyanide release and exposure scenarios appropriate for the operation;
- 3) involve on-site and external personnel with designated roles for responding to cyanide incidents; and
- 4) are evaluated to determine the adequacy of the planned actions and training of responders, and to identify any needed improvements to the operation's response plans and training programs.

For initial certification audits, the auditor should verify that the operation has conducted at least one emergency drill, and for recertification audits, that the operation has conducted at least one drill each year over the entire three-year recertification period. In both cases, the audit reports should indicate whether the drills tested the operation's entire cyanide emergency response process and whether the operation addressed all expectations identified in ICMI's Guidance documents for mining, transportation, and production operations.