The CODE

The Newsletter of
the International Cyanide
Management Institute
www.cyanidecode.org

4th Quarter 2022 Edition

Welcome to the 4th Quarter 2022 edition of *The Code*.

Rollout of Audit Notification System Begins

A web-based, notification system will be rolled out January 1, 2023.

The system will allow operations participating in the Cyanide Code to provide ICMI with advance notification of their planned audit dates and the auditors expected to perform the audits. The system will require that operations electronically submit a form available on the Cyanide Code website at Notification of Planned Audits and Auditors to provide the planned audit dates, the auditors planned or contracted for the audit, and their audit company.

ICMI is also requiring that operations submit the completed form no less than 60 days prior to the planned audit date.

This system will allow ICMI to review in advance the planned auditors for potential conflicts of interest, and potential violations of the restrictions on performing consecutive audits. It will also provide ICMI with early warning of audit scheduling issues. For example, if ICMI has not been notified of an upcoming audit by 60 days in advance of its audit due date, ICMI will have time to remind the operation of its audit obligations. Many auditors already routinely notify ICMI of upcoming audits, but this system will put ICMI in direct communication with operations regarding auditors and audit timing. The ability to track whether audits have been scheduled and conducted before the three-year audit deadline has become increasingly important since the onset of COVID.

ICMI has also revised its Signatory Application Form to include this expectation for advance notice, and it has also revised selected program documents to make it clear that pre-operational certification audits are included in the prohibition of three consecutive audits by the same auditor. Although it will be the responsibility of operations to make this notification, ICMI has informed all currently-approved auditors, both lead auditors and technical auditors, of the advance notification requirement, while also reminding auditors that the applicable consecutive audit prohibitions include pre-operational audits.

ICMI announced this advance audit notification system on December 6, 2022.

Portuguese Language Section Added to Cyanide Code Website

In November, Portuguese translations of ICMI's key program documents became available online, joining Spanish, French and Chinese translations along with English, ICMI's official language. All documents submitted to ICMI must be written in English.

The Cyanide Code is supported by a suite of documents that provide guidance and instructions to participating operations in preparing for certification and to auditors in assessing compliance. These documents also provide information, instruction, and details on administrative requirements for participating companies and auditors.

Versions of the Cyanide Code program documents in available languages may be accessed on the Languages Page of the Cyanide Code website.

Training in Turkey

AMD 2006 TURKISH GOLD MINERS ASSOCIATION

ICMI, in cooperation with the Turkish Gold Miners' Association, will host a conference on Cyanide Management and the Cyanide Code in Ankara, Turkey. The one-day conference will be held on Wednesday, January 11, at the Sheraton Ankara Hotel, and will feature presentations by Turkish government officials, Turkish gold mining executives, and ICMI senior executives.

Simultaneous translation will be available for attendees, and slides accompanying presentations will be shown on split screens in both Turkish and English. For further information about the program and registration contact the Turkish Gold Miners Association.

Cyanide Code Adds Five Signatories in Final Quarter of 2022

The Cyanide Code added five companies to its list of Cyanide Code signatories in the final months of 2022. These include SOPAM CHEM a company that operates warehouses storing cyanide in Burkina Faso and Ghana and was admitted as a signatory in the production category.

Four transport companies were also admitted to the program: Les Centaures Routiers, a cyanide transporter based in Côte d'Ivoire; ENLOG S.A., a cyanide transporter in Brazil; Intermaritima Portos e Logistica S.A., a cyanide transporter based in Brazil; and and SCOMAT, SA, a cyanide transporter based in Mauritania.

By becoming signatories to the Cyanide Code, 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.

New Podcast Episodes Added to CodeCast Series

Season Two of our CodeCast podcast series has been released with five new episodes added to the CodeCast library of podcasts.

These short podcasts explore and explain specific topics and expectations within the Cyanide Code. The podcasts are designed to supplement other forms of training that ICMI offers. Among the new topics added to the series are pipeline spill prevention and containment, use of the Cyanide Code framework and system to manage dangerous goods other than cyanide, and situations requiring notification to ICMI, such as cyanide-related incidents, or changes in cyanide suppliers. Listeners can access the podcasts from the podcast page on our website Podcasts | The Cyanide Code, or from iTunes and Spotify.

Auditor's Corner: Spill Remediation Procedures

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 operations to incorporate detailed cyanide spill remediation measures and monitoring elements into their response plans, and outlines the information that auditors should include in the audit reports to describe the remediation procedures. The Code's intent is to ensure that operations are prepared to respond to cyanide spills with comprehensive procedures designed to guide the complete remediation.

Releases of cyanide solution or solids at operations are not routine and typically occur very infrequently. Therefore, it is important that remediation plans include specific information so that workers can respond quickly to prevent or minimize adverse impacts to health, safety and the environment. Having written procedures, on which workers are trained, that include items such as the treatment chemical(s) used, storage locations, and preparation instructions, will save vital response time. Furthermore, detailed sampling and analysis procedures that specify targeted end-point cyanide concentrations will guide response personnel to ensure that spill remediation is accomplished fully.

Question 5.5.1 in the Cyanide Production Verification Protocol and Question 7.5.1 in the Mining Operations Verification Protocol asks: *Does the Plan describe specific remediation measures as appropriate for the likely cyanide release scenarios, such as:*

a) *Recovery or neutralization of solutions or solids?*

b) *Decontamination of soils or other contaminated media?*

c) *Management and/or disposal of spill clean-up debris?*

d) *Provision of an alternate drinking water supply?*

As discussed in ICMI's Guidance for Use of the Cyanide Production Verification Protocol and Guidance for Use of the Mining Operation Verification Protocol, procedures for neutralization or decontamination of cyanide spills should:

1) *identify what treatment chemical is to be used and where it is stored;*

2) *describe how the treatment chemical is to be prepared to the appropriate concentration; and*

3) *define the end point of the remediation, including how samples will be taken, what analysis will be performed, and what final concentration will be allowed in residual soil.*

In responding to these questions, audit reports should indicate whether the operation's response plans describe the remediation measures listed in the protocol question (i.e., items a through d, above) and should also provide a description of the remediation tasks, taking care to address all aspects of the three elements listed above. Where operations do not use treatment chemicals to remediate spills, the auditor should describe the measures implemented, such as excavation of contaminated soils (e.g., "dig to dry"). Response plans that include generic statements such as "clean up the spilled material" or "neutralize with sodium hypochlorite" are not sufficient, as they do not provide any instructions on how these tasks are to be accomplished. In the audit reports, auditors should note the documents implemented by the operation to meet the Code's expectations as well as the activities that the operation would undertake to ensure proper remediation.

In addition to the spill remediation procedures discussed above, to the extent practical, an operation should plan for the necessary monitoring activities in the event of a release. Based on the potential release scenarios identified in its response plans, the operation should determine the sampling and analytical methodologies it will use if cyanide is released to the land or surface water. It may also be feasible to determine the necessary sampling locations. For example, if the potential flow path of a release can be predicted from the site's topography, then sampling locations can be established at the point of entry into surface water as well as upstream and downstream locations. To the extent practical, this type of information, which may also address the sampling associated with remediation activities, should be included in the operation's response plans or other available documentation for the auditor's review, and the audit reports should provide a description of the remediation sampling and monitoring activities.

Furthermore, Question 3.4.1 in the Cyanide Transportation Verification Protocol asks, *Are there procedures for remediation, such as recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill cleanup debris*. If the transporter or consigner conducts its own remediation actions, it should have procedures for remediation detailing how these activities will be conducted, even though, in many cases, a truck transporter or consigner will not be directly involved with the cleanup and remediation of a cyanide spill that occurs during transport or interim storage. Where commercial chemical remediation contractors or other external responders are expected to provide this service to the transporter, they should be identified in the transporter's Emergency Response Plan or other documentation, and auditors should verify, and indicate in the audit reports, that they are available to perform remediation activities.