The CODE

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

4th Quarter 2023 Edition

What's Inside

Welcome to the 4th Quarter 2023 edition of *The Code*.

Intergovernmental Forum on Mining, Minerals and Sustainable Development Includes Cyanide Code in Updated Mining Policy Framework

The 19th Annual General Meeting of the International Governmental Forum (IGF) on Mining, Minerals, Metals, and Sustainable Development (IGF) was convened in Geneva on November 7-9, 2023. With 81 member countries, the IGF serves to foster dialogue among the members' governments, and with stakeholders representing a wide range of viewpoints and constituents.

A policy guidance tool developed by the IGF is its cornerstone Mining Policy Framework (MPF), which outlines practices that support good governance in mining throughout the mining life cycle. In 2023, the IGF launched a process to update the MPF to meet the evolving needs of its member countries. The year-long process included extensive consultations with IGF´s 81 members and other stakeholders that resulted in an updated MPF reflecting the changing global context in which mining is now undertaken and to include evolving international commitments and benchmarks, good international practices, as well as experiences and lessons learned from MPF assessments performed over the past 10 years. During the IGF General Council in Geneva, member countries ratified the updated Mining Policy Framework.

Notably for cyanide management, in Part II of the MPF (the Guidance Notes), it is stated that: "Government should have standards and permit requirements for the storage and transport of hazardous materials that align with good international practices. For cyanide management, this includes adhering to the International Cyanide Management Code." [Section 4.4.2.c] Later in the document when outlining the recommended steps that governments take to reduce and eliminate, where possible, the use of mercury and other toxic substances from artisanal and small scale mining processes, the MPF advises: "Government should be knowledgeable about toxic-substances-free technology and promote clean and efficient small-scale mining practices following international best practices like the International Cyanide Management Code on safe use, transport, and disposal of cyanide in artisanal and small-scale gold mining." [Section 6.2.3]

The Updated MPF, together with the Guidance Notes can be accessed here.

ICMI Senior Vice President Keynotes Conference in Peru

ICMI's Senior Vice President, Eric Schwamberger, was a keynote speaker at the 9th International Congress on Social and Environmental Sustainability, Metallurgy and Mining in Lima, Peru, which was held October 17-20, 2023. The Conference was hosted by Colegio de Ingenieros del Perú.

Dr. Schwamberger shared his insights on the benefits of the Cyanide Code as a risk management system, and its expanding adoption in the global gold mining industry.

ICMI Senior Vice President, Eric Schwamberger

Elko Workshop

ICMI hosted a training workshop on November 9, 2023, in Elko, Nevada, on implementing and auditing the International Cyanide Management Code. The one-day workshop attracted 52 attendees from mining companies, cyanide transport operators, cyanide manufacturing companies, and audit professionals.

The workshop presenters were ICMI Senior Vice President Dr. Eric Schwamberger, and Vice President for Standards Assurance Mark Montoya.

ICMI is planning three workshops for 2024, with one to be held in West Africa, the second in Indonesia, and the third in Mexico. Details will be forthcoming in early 2024. These Code workshops provide an opportunity for companies that have not yet become signatories to learn firsthand about the Cyanide Code, and for workshop participants to discuss with ICMI officials issues of importance to them. The sessions will offer insight into the procedural and interpretive aspects of the Cyanide Code to prepare operations for successful audits and to make Cyanide Code auditors more effective. The workshops focus on the Cyanide Code's certification program and the practical issues associated with implementing and auditing the Cyanide Code at operations. ICMI officials discuss the intent of each of the Cyanide Code's Principles and Standards of Practice, along with the Cyanide Code's expectations for performance and the measures typically necessary to achieve that performance. Interpretive guidance is provided on how auditors are to use their professional judgment in determining whether an operation is in compliance with the Cyanide Code. The presentations provide participants with the critical knowledge and understanding of the Cyanide Code necessary to identify appropriate and acceptable measures to improve cyanide management and meet the Cyanide Code's performance-based goals.

Auditor's Corner

Protection of Worker Heath and Communities From Cyanide Emissions at Production Operations

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 protection of worker health and communities from cyanide emissions at production operations. Production Practice 3.1 requires that production operations conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts. As part of this requirement, the Code asks in Production Protocol Question 3.1.6 whether an operation can demonstrate that the levels of atmospheric process emissions of hydrogen cyanide gas or cyanide dust are limited in order to protect the health of workers and the community.

An important aspect of this question is that it asks for protection of both workers and communities. In auditing production operations and writing the audit reports, auditors should evaluate and describe the systems in place not only for protection of workers, but also for protection of communities.

For worker protection, the Production Guidance recommends a hydrogen cyanide and cyanide dust limit of 10 parts per million on an instantaneous basis or 4.7 parts per million continuously over an 8-hour period. These are the same limits for worker protection that are referenced in the Mining Guidance under Mining Protocol Question 6.2.2. As at mining operations, production operations typically demonstrate worker protection using monitoring data from either fixed or personal HCN monitors, information on ventilation and dust collection systems, and use of personal protection equipment.

For protection of communities, the Auditor Guidance does not set limits, but states that operations should ensure that nearby communities are not exposed to concentrations of hydrogen cyanide gas or cyanide dust in excess of applicable limits for ambient air quality. In evaluating whether adequate systems are in place for protection of communities, auditors should consider the location of the cyanide production facility, such as its distance to residential areas or other communities. Many cyanide production operations are located in industrial parks, which may be at a distance from residential areas, and this should be noted in the audit report, either in response to this production Question 3.1.6, or in the operation location and description requested at the beginning of the audit report. Although monitoring of emissions may not be required or necessary, if an operation does monitor for cyanide emissions, auditors should indicate whether the monitoring is required for regulatory compliance, or is necessary due to proximity of communities or for other reasons. Finally, auditors should indicate whether any emissions or air quality limits are based on the Code's recommendations, applicable laws and/or regulations, or other self-imposed standards.