



The CODE

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

3rd Quarter 2025 Edition

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Welcome to the Third Quarter 2025 edition of *The Code*.

Auditor Roundtable Convened

In July, ICMI hosted a two-day Roundtable meeting in Denver, Colorado, attended by auditors experienced in Cyanide Code audits. The intent of the meeting was for ICMI to gain the auditors' perspectives regarding how the Cyanide Code's auditing and certification component might be refined or improved.

The Roundtable was designed as an initial step in an undertaking to review and potentially revise the Cyanide Code's documents and processes related to auditors, auditing, and compliance. ICMI conducted a similar review and revision process in 2019-2020. In this current process, ICMI will seek input from a broad range of stakeholders, including signatory companies, operations, auditors, the broader gold and silver industry, and the general public.

The Roundtable was hosted by Paul Bateman, ICMI's President, moderated by Dr. Eric Schwamberger, Senior Vice President, ICMI, and assisted by Mark Montoya, Vice President for Standards Assurance, ICMI. Participating auditors included Arend Hoogervorst (South Africa), Nicole Jurczyk (U.S.), Bruno Pizzorni (Peru), Mike Woods (Australia), Celso Sandt Pessoa (Brazil), Luiz "Tito" Campos (U.S.), Benjamin Amoo-Mensah (Ghana), and Dr. Ata Akcil (Turkey).



Roundtable participants

Selection of participating auditors was based on factors that included number, variety, and geographical distribution of audits led, frequency of audits in the past four years, and backgrounds related to outside use of cyanide.

The Roundtable covered topics of interest suggested by both ICMI and auditors regarding the Cyanide Code and its programmatic systems. These discussion topics were organized into eight sessions, covering the following areas:

- (a) guidance documents;
- (b) auditor requirements and the auditing process;
- (c) audit reports and reporting;
- (d) audit administration;
- (e) cross-facility (mines, production, transport) compliance expectations;
- (f) mining operations compliance expectations;
- (g) production and warehouse operations compliance expectations; and
- (h) transporters and transport supply chains compliance expectations.

Thirty-three discrete discussion topics were introduced and discussed during the two-day meeting. The following areas of discussion were of particular note.

Guidance Document Improvements

A lengthy discussion occurred on ways that ICMI might make its guidance documents more effective as practical tools for developing safe cyanide management systems. Auditors suggested that the guidance documents would benefit from incorporation of practical examples and descriptions of leading and alternative practices, along with more extensive explanatory material on many of the Code's expectations and requirements.

Worker Safety

Discussions centered on greater emphasis on the Code's expectations for worker safety for maintenance workers at both production operations and mining operations, as well as the safety of workers during transfer of liquid cyanide. Auditors noted that, as risks and safe management practices for solid cyanide can be very different from liquid cyanide and cyanide gas, greater emphasis should be placed on distinguishing and characterizing safety expectations for the different forms; in particular, for high-risk activities such as liquid cyanide delivery, and for maintenance workers in locations with high-strength cyanide present.

Continuous Compliance and High Employee Turnover

High employee turnover, and resultant potential for degradation of systems necessary for Code compliance, was discussed. Two systems were explored as ways to help guard against degradation of compliance systems and awareness between audits. The first was requiring interim compliance reviews during the three-year period between audits. Many mining operations already conduct such interim compliance reviews, and a number of auditing schemes (in particular ISO) require interim reviews ("surveillance audits") to monitor continual effectiveness of operational management systems. Auditors agreed that such interim reviews are beneficial to operations, help counter compliance issues caused by staff and worker turnover, and increase operational awareness of the Code's compliance expectations and the systems in place to meet those expectations. One auditor noted that at transport operations and transloading operations there is sometimes no one at the operation who was present at the previous audit.

Similar discussion occurred on requiring certified operations to have a designated Cyanide Code lead or “champion,” who would be responsible for arranging audits, interacting with ICMI, communicating any changes to the Code to an operation, etc. Auditors noted that there is almost always a lead or champion at certified operations.

ICMI will further evaluate these and other potential changes to Code documents based on the discussions, comments, and suggestions made at the roundtable. ICMI will solicit additional ideas on the roundtable discussion items with the Industry Advisory Group and other stakeholders.

New Signatories in Third Quarter

The Cyanide Code welcomed nine new signatories in the third quarter, including one mining company, a cyanide producer, and seven transporters.

In July, ICMI accepted the application of Dhilmar Éléonore LP to become a signatory. The company operates the Éléonore Mine in Canada, which it acquired from Newmont Corporation in March 2025. The mine had achieved Cyanide Code certification twice while owned by Newmont, and was recertified in full compliance with the Cyanide Code in September 2025 under Dhilmar’s ownership.

[Talas Investment Company LLC](#), which produces sodium cyanide in Kazakhstan, became a signatory in the producer category in September. The company had previously been a Code signatory from 2019 to 2023 but never achieved certification.

The seven new transport signatories include four from Africa: Fracht Senegal SAS, Senegal; Jema Chemicals Company Limited, Tanzania; SNIAF Logistics, Mali; and Societe Mahamoudou Djire et Fils, Mali. Also joining the Code were NIKA Logistics a.s., Czechia; PT Anggaraksa Internasional Multimoda, Indonesia, and Westref Pty Ltd., Australia.

For more information about these companies, as well as other companies participating in the Cyanide Code, see the [signatory directory](#) on our website.

Antonio A.M. Pedro Elected to Board of Directors

The Board of Directors of the International Cyanide Management Institute has elected Antonio A.M. Pedro as a member of the Board. Mr. Pedro is the former Deputy Executive Secretary (Programme Support) of the United Nations Economic Commission for Africa (ECA). He retired from ECA in early July, concluding 29 years of service within the UN system.

Mr. Pedro, a native of Mozambique, is a mineral exploration geologist with more than 40 years of experience, with broad involvement in and exposure to international development issues and management at national, sub-regional, and continental levels.



He joined ECA in 2001, where he has worked in various roles, most recently as Director of ECA's Sub-regional Office for Central Africa, from 2016 to 2021, based in Yaounde, Cameroon, and as Director of the ECA Sub-regional Office for Eastern Africa, in Kigali, Rwanda.

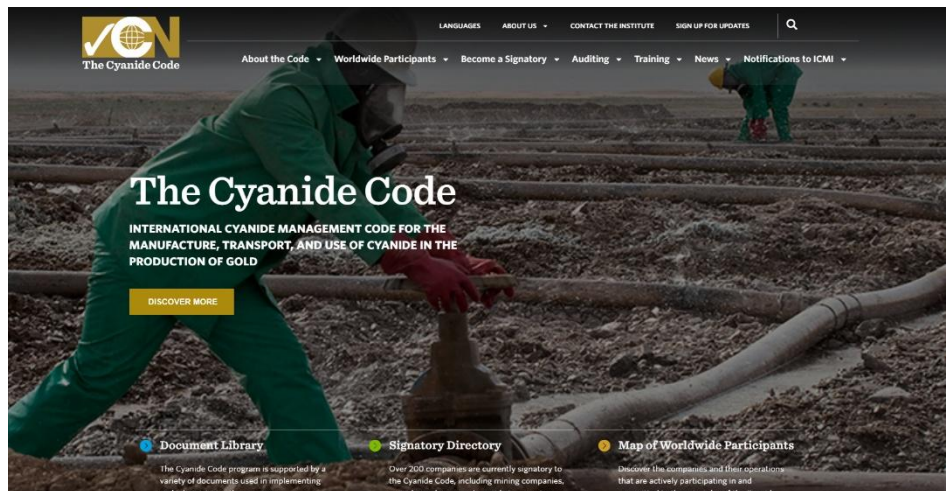
Prior to joining ECA, Mr. Pedro was the Director General of the Southern and Eastern African Mineral Centre, in Dar es Salaam, Tanzania; Managing Director of several companies in Mozambique, and Deputy National Director of Mozambique's Geological Survey.

Mr. Pedro was a member of the multi-stakeholder advisory group for the Global Tailings Review, which resulted in the creation of the Global Industry Standard on Tailings Management. Earlier, he was a member of the International Resources Panel, Leadership Council of the UN Sustainable Development Solutions Network, Co-Chair of the SDSN Thematic Network on the Good Governance of Extractive and Land Resources, a faculty member and visiting lecturer of the Extractive Industry and Sustainable Development Executive Training Programme at Columbia University's Centre on Sustainable Investment, as well as a former lecturer on Mineral Policy and Contract Negotiations at the United Nations African Institute for Economic Development and Planning.

Mr. Pedro holds a Bachelor of Science from Eduardo Mondlane University, Maputo, Mozambique, and a Master of Science in Mineral Exploration from the Royal School of Mines, Imperial College, London.

Cyanide Code Website Enhance Project Completed

In August, ICMI completed work on a project to enhance user experience and the visual appeal of its website. The revisions focused on better organization of information, improved navigation, refreshed images and graphics to enhance the site's aesthetics, revised formatting to improve content legibility and eye-tracking, and mobile responsiveness to ensure seamless experience across different screen sizes and devices.



Functionality of two key website features was significantly improved. The background formatting of ICMI's online list of approved auditors now allows for searching by auditor name, location, and company, and users can now also alphabetically reorder the list by name, location, and company. Additional search capabilities were added to the signatory map. The map shows locations of all participating operations. Searches are now possible by company, type of signatory (mining, production, transportation), and by compliance status such as certified, designated for certification but not yet certified, substantially compliant, non-compliant, and pre-operationally certified.

Auditor's Corner

Maintenance of Cyanide Transport Equipment

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 inspections and maintenance of transportation equipment.

The Cyanide Code considers transportation equipment to include not only truck tractor units, but also trailers, dry vans, sea containers, ISO Tanks, tanker units, and any other types of containers used in transport and movement of cyanide. Transport equipment also includes forklifts, cranes, top loaders and similar pieces of mobile equipment that are used to load and unload cyanide.

In auditing transport operations, focus is typically on truck tractor units. However, auditors should review and note the full suite of transport equipment being used by the transporter, such as trailers and ISO Tanks, in addition to truck tractors. Similarly, auditors should review and note any inspection and maintenance programs in place not only for truck tractor units, but for all transport equipment in use. Expectations for inspections and equipment maintenance for cyanide transporters are discussed under Transport Standards 1.3 and 1.4 in the Transportation Guidance.

As discussed in the Transportation Guidance, some transport equipment may not be owned by the transporter. Maintenance of this equipment may be the responsibility of the equipment owner, or other third party, rather than the transporter. Examples include sea containers, which are frequently owned and maintained by large shipping companies, and ISO Tanks, which are frequently owned and maintained by cyanide producers. Transport auditors should note in their transport audit report any transport equipment that is either owned or maintained by a third party, and indicate where the responsibility lies for maintenance and inspections of that equipment. However, maintenance and inspection programs for transport equipment that are owned by a producer, such as ISO Tanks, should be included in audits of the producer, rather than the transporter, unless the transporter also performs inspection or maintenance activities on the units.

Mines and cyanide production facilities frequently also operate transport equipment such as forklifts, cranes, and top loaders, that are used to move, store, load or unload cyanide boxes, drums, and sea containers. Auditors of production and mining facilities should examine inspection and maintenance programs for any forklifts, cranes, or similar mobile transportation equipment that is used at those facilities.

ICMI thanks auditors in advance for paying close attention to inspection and maintenance programs for all types of transport equipment used by transporters, as well as by producers and miners.