
CORRECTIVE ACTION PLAN

AFRICAN BARRICK GOLD TULAWAKA GOLD MINE, TANZANIA

Introduction

One of the components of the auditing of the ICMI Cyanide Code is the development of a Corrective Action Plan for those parts of the audit findings that have been found to be in substantial compliance and require focussed responses to take the site to full compliance.

ICMI requirements indicate that Corrective Action Plans and notification thereof must be completed within 12 months of posting of the Plan on the ICMI website.

The section below details the corrective actions, agreed by the African Barrick Gold Tulawaka Gold Mine and the Lead Auditor, necessary to bring the African Barrick Gold Tulawaka Gold Mine into full compliance, as indicated in the Detailed Audit Report.

Corrective Action Plan - 1

Principle 3 – Handling and Storage: Protect workers and the environment during cyanide handling and storage.

Handling and Storage Practice 3.1 Design and construct unloading, storage and mixing facilities consistent with sound, accepted engineering practices, quality control/quality assurance procedures, spill prevention and spill containment measures.

Deficiencies

- Boxed and bagged solid cyanide was stored in old seatainers designed to transport solid cyanide, but not store it. As operational and maintenance inspections of the facilities were inadequate and not meeting the minimum inspection requirements suggested by the producer, the cyanide storage area was deemed not fully compliant with Code requirements and appropriate manufacturer's guidelines and inspection requirements.

Corrective Actions

- The site has an action plan to modify newer seatainers for roofed storage purposes, locate them closer to the mixing area, on an impermeable surface with appropriate containment and spillage recovery facilities. This coincides with an action to re-route the currently buried slurry pipeline to

be placed above ground and under the fence which will create additional space for the new cyanide storage area.

- The transitional arrangements involve temporarily storing cyanide in seatainers whilst the ground works are completed and appropriate design and modification specifications are drawn up and executed. The seatainers will be temporarily stored on a cement floor adjacent to the existing reagent shed. Additional inspections will be instituted to check the integrity of the seatainers until they are moved to the new storage area. This will be undertaken and completed before the advent of the rainy season. Current corroded 20 foot seatainers are being replaced with newer competent 40 foot seatainers.

Evidence for Auditors

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

- Photographic evidence of the transitional arrangements, documentary evidence of the inspections and the temporary operating procedures, proof of maintenance of the seatainers.
- Photographic evidence of new completed commissioned storage area. Documentary evidence of new standard operating procedures and planned maintenance program.

Completion Date:- 30 April 2012

Corrective Action Plan - 2

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

Operations Practice 4.7 Provide spill prevention or containment measures for process tanks and pipelines.

Deficiencies:

- A section of the TSF pipeline and return water pipeline is buried 0.5m deep between the residue pipe rack and the trench (part of which is inside the plant) a distance of approximately 50m. However, no evidence of groundwater contamination from leaks was identified.

Corrective Actions

- Reroute the pipelines above ground designed with spill prevention or containment measures.

Evidence for Auditors

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

- Appropriate photographic evidence to demonstrate the completion of the project

Completion Date:- 30 November 2011

Consolidated Completion Date:- 31 May 2012



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