



# The CODE

The Newsletter of  
the International Cyanide  
Management Institute  
[www.cyanidecode.org](http://www.cyanidecode.org)

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Welcome to the International Cyanide Management Institute's (ICMI)  
First Quarter 2016 Cyanide Code Newsletter.

## **Auditor Rotation Integral to Cyanide Code Program**

The Cyanide Code requires that participating operations be audited every three years to verify compliance with the Cyanide Code's Principles and Standards of Practice (or Production or Transport Practices, as applicable). This certification program relies on the expertise and integrity of independent, third-party auditors to conduct audits to determine compliance with the program. As many operations are now undergoing their third or fourth certification audit, we want to remind both auditors and participating companies of the program's requirements for auditor rotation.

Cyanide Code verification audits must be conducted by auditors meeting requirements established by ICMI for professional certification, experience and expertise. Both lead and technical expert auditors also must be free of conflicts of interest with the audited operation and the signatory company. Individual auditors, not audit companies, are approved to conduct Cyanide Code certification audits based on each auditor's professional and technical qualifications; the auditors make findings of compliance and decisions regarding an operation's certification.

To foster auditor independence, an individual lead or technical auditor may not perform more than two consecutive audits for a particular gold mine, cyanide production facility, or cyanide transport operation. Audit firms are limited to conducting three consecutive audits of the same operation, after which the operation must engage a different firm to conduct the next required audit.

It is important that operations confirm the eligibility of auditors and audit firms to perform Cyanide Code certification audits prior to their engagement. The Code's prohibitions on auditor conflicts-of-interest, requirements for auditor rotation, and criteria for lead and technical expert auditors are detailed in ICMI's [Auditor Criteria](#).

Failure to adhere to the program's auditor criteria can have a costly impact on the operation because ICMI will not accept the report. The consequence to the auditor and/or the audit firm can include suspension from the program or a revocation of the approval to serve as an auditor.

# China Encourages its Gold Industry to Adopt Cyanide Code at Overseas Operations

The China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters, a national industry association that operates under the guidance of China’s Ministry of Commerce, has released the first industry specific guidance on social responsibility for China’s mining industry. The [“Guidelines for Social Responsibility in Outbound Mining Investment”](#) requires Chinese mining companies to include social and environmental factors in the management plans for their overseas operations, and specifically encourages mining operations using cyanide to be certified in compliance with the Cyanide Code. The guidelines regulate Chinese mining investments and operations while helping Chinese companies to improve corporate social responsibility, sustainability strategies and management systems. The guidelines span a range of issues, including labor, environmental protection, occupational health and safety, value-chain management, community engagement and human rights.

## Compliance with Standard of Practice 4.4, Wildlife Protection

Standard of Practice 4.4 of the Cyanide Code requires mines to implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.

ICMI reminds its gold mining signatory companies and the auditors conducting gold mine certification audits that absent scientific evidence to the contrary, a concentration of WAD (Weak Acid Dissociable ) cyanide greater than 50 mg/L is considered under the Cyanide Code to be toxic to wildlife. Allowing wildlife access to a solution exceeding this concentration presents an immediate and substantial risk, and, as discussed in ICMI’s [Auditor Guidance for Use of the Gold Mining Operations Verification Protocol](#) (2012), a finding of substantial or full compliance cannot be made for a Standard of Practice if a deficiency presents an immediate or substantial risk to health, safety or environment.

The 50 mg/L WAD cyanide limit applies where wildlife has access to the gold mining process solution. Access by terrestrial wildlife typically can be prevented with fencing, but access by avian wildlife requires additional measures. If shorebirds may be present at the site, the limit must be met at the discharge to a tailings impoundment, as these types of birds interact with tailings solution as it flows across the beach of an impoundment. If shorebirds are not present, the limit is applied in the supernatant pond. The limit also applies to solutions on leach heaps and in leach ponds and solution recovery channels regardless of the types of birds in the area.



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The Cyanide Code helps to protect birds and other wildlife.

The Standard requires that operations with solutions exceeding 50 mg/L WAD cyanide take actions to prevent wildlife mortality. This means that an operation that allows wildlife access to solution with this level of cyanide is not in compliance even if no mortality is observed. On the other hand, an operation with systems in place to maintain WAD cyanide concentrations at or below 50 mg/L but which has isolated exceedances of the limit may still be in substantial or even full compliance with Standard of Practice 4.4. In determining compliance in such situations, the auditor must evaluate the cause, number, frequency and duration of the exceedances, the operation's response to them, and the effectiveness of the measures implemented by the operation to prevent their reoccurrence. A similar evaluation is necessary if an operation's exclusionary measures (such as netting or bird balls) fail, allowing access to toxic solution and resulting in wildlife mortality. The auditor's evaluation of these factors and rationale for the resulting compliance finding must be included in the audit report.

It must be noted that the Code does not accept hazing technologies such as loud noises as a protective measure, as its effectiveness typically decreases over time. However, hazing can play a significant role in limiting wildlife mortality in cases where continuous and complete protection is not required, such as when cyanide solution must be held for short periods of time in emergency containment or contingency ponds.

Although a WAD cyanide concentration greater than 50 mg/l is considered to be toxic to wildlife, the Cyanide Code does provide a process by which an operation may establish a higher limit via a peer-reviewed scientific study demonstrating that site-specific conditions effectively protect wildlife even at the higher cyanide level. See ICMI's Auditor Guidance for additional details on this process, as well as more extensive discussion of all aspects of Standard of Practice 4.4.