



The CODE

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

1st Quarter 2018 Edition

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Welcome to the 1st Quarter 2018 edition of *The Code*.

Auditing Documents Revised; Auditors Reminded of Deadlines, Obligations, Conflicts of Interest

Several ICMI documents germane to mining certification audits were revised in February 2018 and are detailed on the organization's website. These include [ICMI's Mining Operations Verification Protocol](#), [ICMI's Auditor Guidance for Use of the Mining Operations Verification Protocol](#), and the [Cyanide Code's Implementation Guidance](#). These documents should be used for certification audits of mining operations conducted after February 2018 and should be the versions referenced in audit reports. The documents were revised to include requirements for the use of dye in reagent strength cyanide solutions. The revisions were announced on the Cyanide Code website on February 16, 2018, and become effective July 1, 2019.

ICMI currently has 149 auditors who have submitted their credentials to ICMI and have been approved to conduct Cyanide Code certification audits. Many are approved for several auditing positions such as lead auditor, technical expert for mining, production and/or transportation. Of the 149 approved auditors, nearly half (77) have participated in audits in the past three years. The 149 approved auditors come from 105 firms. Of these 105, 44 firms have had auditors participate in audits in the past three years.

Two types of expertise are required for those conducting certification audits. The lead auditor must be a professional environmental, health or safety auditor, certified as such by an organization meeting ICMI's established criteria. Certification audits also require a technical expert auditor with a minimum of seven years of industry experience as well as experience in conducting environmental, health or safety audits, review, or assessment. Auditors are selected and contracted by the signatory company but must be free of conflicts of interest with the operation being audited. To ensure the independence of its auditors, the program limits at two the number of consecutive audits any individual lead and technical auditor may perform of a particular operation. Audit firms are limited to conducting three consecutive audits of the same operation, after which time the operation must engage a different firm to conduct its next required audit.

The program's credibility with its stakeholders is of paramount importance, and it is essential that audit professionals who conduct certification audits adhere to the highest ethical standards in addition to meeting the Cyanide Code's requirements for experience, expertise, and the lack of conflicts of interest. We ask all auditors to review and be aware of ICMI's Auditor Criteria for lead and/or technical auditors, and will soon be contacting approved auditors to request confirmation that they continue to meet ICMI's requirements and that they wish to remain on our list of auditors approved to perform Cyanide Code certification audits.

The Cyanide Code's audit process and the transparency of audit results set it apart from most other voluntary industry programs. Signatories to the Cyanide Code commit to high standards in operation.

Compliance with the Code is verified through independent third-party audits by professional auditors and technical experts, and the results publicly available to stakeholders on the Institute's website. Independent third-party professional auditors meeting Cyanide Code criteria conduct comprehensive site inspections and evaluate a facility's cyanide management systems and their implementation to verify and certify program compliance.

All auditors are reminded that deadlines for submission of audit reports include:

- Submission of electronic copies of a Draft Summary Audit Report and a Draft Detailed Audit Report to ICMI for completeness review within 90 days of completion of the field portion of the audit. The draft reports should be submitted via audits@cyanidecode.org.
- Submission of electronic copies of the revised Summary Audit Report and revised Detailed Audit report addressing any ICMI comments for final approval within 30 days of receipt of ICMI Completeness Review comments.

ICMI Seeking Comments on Website Revamp

ICMI is planning to improve the Cyanide Code website's navigation, enhance its functionality, make it easier to access audit information, and find information about the Cyanide Code more quickly. The site also will host expanded online training, including videos in English, Spanish, French and Chinese, and certify trainees upon completion of the course.

Users will soon receive a survey asking for suggestions on how the site might be improved for them, what new features they want and anything else that will enhance their experience.

ICMI encourages all users to send their comments and ideas regarding these or other potential improvements.

Canada Proposes Regulation of Ten Cyanide-Related Compounds

Canada's government has proposed adding ten cyanide compounds to Schedule 1 of the Canadian Environmental Protection Act (CEPA), in concert with a risk management plan, after a draft assessment found the substances are potentially harmful to the environment.

The list of cyanide-related compounds includes sodium cyanide, which is commonly used in the gold and silver mining industry.

The proposal notes that ecological exposure of these compounds comes mainly from potential releases of free cyanide from three main sectors of activity: metal mining, iron and steel manufacturing, and the application of ferrocyanide-containing road salts. It found potential hazards to organisms, especially aquatic ones. The draft assessment also stated that the substances are unlikely to pose a danger to human health mainly because of low levels of exposure.

The proposed plan suggests cutting in half the allowable release of cyanides from mining under the Metal Mining Effluent Regulations.

The proposal noted: "Considering all available lines of evidence presented in this draft screening assessment, there is a risk of harm to organisms, but not to the broader integrity of the environment from cyanides, which include free cyanide and precursors of free cyanide. It is proposed to conclude that free cyanide and precursors of free cyanide meet the criteria under paragraph 64(a) of CEPA, as they are entering or may enter the environment in a quantity or concentration or under conditions that have or may have an immediate or long-term harmful effect on the environment or its biological diversity. However, it is proposed to conclude that free cyanide and precursors of free cyanide do not meet the criteria under paragraph 64(b) of CEPA, as they are not entering the environment in a quantity or concentration or under conditions that constitute or may constitute a danger to the environment on which life depends."

For details, see the notice in the [Canada Gazette](#).

Click here to read the [Draft Screening Assessment, Cyanides](#) and the [Risk Management Scope for Cyanides](#).