International Cyanide Management Code
Re-Certification Audit
AngloGold Ashanti Australia Ltd
Sunrise Dam Gold Mine

Summary Audit Report

September 2017
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1. Summary Audit Report for Mining Operations

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2. Location Detail and Description of Operation

The Sunrise Dam Gold Mine (SDGM) is located within the Northern Goldfields region of Western Australia, some 220 km north-northeast of Kalgoorlie and 55 km south of the township of Laverton. The mine is situated immediately to the east of the hypersaline Lake Carey and is surrounded by numerous other small saline lakes.

The nominal Processing Plant capacity is some 3.9 million tonnes per annum, subject to ore characteristics and grind requirements. A total of 4 million tonnes was treated in the 2016 calendar year.

The Processing Plant employs gravity/carbon-in-leach (CIL) technology to recover gold through processing up to a maximum licensed rate of 4.5 million tonnes per annum. The major unit processes within the processing plant are crushing, grinding, classification, gravity recovery, gold leaching, gold recovery, and tailings disposal.

The Processing Plant is fed primarily by ore from the Underground Mine, although supplementary ore is fed from existing Open Pit stockpiles.

The ore is trucked to a run of mine (ROM) pad, prior to being blended and fed to the Processing Plant. Ore is sequentially crushed, ground and classified, with an ore slurry reporting to the CIL circuit, wherein sodium cyanide solution is added as the primary lixiviant to leach gold from the ore. The leached gold is adsorbed from the
slurry using activated carbon particles. Activated carbon is periodically removed from the CIL circuit and reports to the Elution circuit, wherein gold is stripped from loaded carbon and reports to the Gold Room for subsequent gold bullion production.

The final tailings slurry from the CIL circuit reports to a tailings thickener for process water recovery. Final tailings slurry, now thickened to a density of approximately 68% solids is pumped to the Tailings Storage Facility (TSF). The operation employs a Central Thickened Discharge tailings storage facility (CTD), which minimises open water area.

The operation uses 30% w/v liquid sodium cyanide, which is transported in isotainers by rail from the Producer’s production facility (located at Kwinana some 40 km south of Perth within the state of Western Australia) to a trans-shipping facility at Kalgoorlie, where it is then transported by road to the operation. Solid cyanide is not transported to, stored, mixed or used at the operation.
SUMMARY AUDIT REPORT

Auditor’s Finding

This Operation is

☑ in full compliance
☐ in substantial compliance
☐ not in compliance

with the International Cyanide Management Code.

This operation has maintained full compliance with the International Cyanide Management Code throughout the previous three-year audit cycle.

Audit Company: Veritas Metallica Pty Ltd
Audit Team Leader: Thomas Gibbons
Email: Tom_G@westnet.com.au

Names and Signatures of Other Auditors:

Ray Biehl 26 September 2017

Date(s) of Audit: 01 – 05 May 2017 Inclusive.

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute.

I attest that this Summary Audit Report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Gold Mine Operations and using standard and accepted practices for health, safety and environmental audits.
**PRINCIPLE 1 - PRODUCTION:**

*Encourage responsible cyanide manufacturing by purchasing from manufacturers who operate in a safe and environmentally protective manner.*

**Standard of Practice 1.1:**

*Purchase cyanide from manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment.*

☑ in full compliance with

The Operation is ☐ in substantial compliance with ☐ not in compliance with Standard of Practice 1.1

**Summarize the basis for this Finding/Deficiencies Identified:**

The Operation has purchased cyanide solely from Australian Gold Reagents Ltd (AGR) during the certification period. The active supply contract with AGR requires that the Production Facility be certified as compliant with the Code. It is noted that during the renewal of the supply contract during the certification period, the Code requirements for Standard of Practice 1.1 were further clarified in clause 35.

The cyanide supplied by AGR was solely in the form of 30%w/v liquid sodium cyanide within isotainers and has been produced at AGR’s Production Facility in Kwinana, Western Australia. This Production Facility was certified as fully compliant with the Code on 13 March 2014. At the time of the physical SDGM audit, it was confirmed that AGR had completed the physical audit component of its 2017 recertification audit.

Australian Gold Reagents Pty Ltd.’s sodium cyanide production plant in Kwinana, Australia was recertified in full compliance with the International Cyanide Management Code (Cyanide Code) on 03 August 2017.
**PRINCIPLE 2 - TRANSPORTATION:**

*Protect communities and the environment during cyanide transport.*

**Standard of Practice 2.1:**

*Establish clear lines of responsibility for safety, security, release prevention, training and emergency response in written agreements with producers, distributors and transporters.*

- [ ] in full compliance with
- [ ] in substantial compliance with Standard of Practice 2.1
- [ ] not in compliance with

**Summarize the basis for this Finding/Deficiencies Identified:**

The active sodium cyanide supply contract with AGR requires that transportation be carried out via a supply chain that is compliant with this Standard of Practice. It is noted that during the renewal of the supply contract during the certification period, the Code requirements for Standard of Practice 2.1 were further clarified in clause 35.

AGR has been certified as a Transporter since September 2006. SDGM forms part of AGR’s West Australian Supply Chain, of which the most recent date of recertification is 26 September 2016. This supply chain continues to be the sole means of cyanide transportation to SDGM, as verified over the period of certification.
**Standard of Practice 2.2:**

Require that cyanide transporters implement appropriate emergency response plans and capabilities and employ adequate measures for cyanide management.

☑ in full compliance with

☐ in substantial compliance with Standard of Practice 2.2

☐ not in compliance with

**Summarize the basis for this Finding/Deficiencies Identified:**

SDGM has continued to utilise AGR as sole Producer and Transporter of cyanide over the certification period and contractually requires that AGR be certified under the Code, as detailed in clause 35 of the supply contract. The contract addresses roles and responsibilities for safety, security, release prevention and emergency response.

AGR’s compliance with the Code includes verification of the adequacy of emergency response plans and capabilities applicable to the transportation of cyanide to SDGM. The most recent recertification date of AGR’s West Australian Supply Chain, which includes all aspects of transportation of cyanide from their Kwinana Production Facility to SDGM, is 26 September 2016.

SDGM has maintained chain of custody records for cyanide supply/transportation over the certification period.
PRINCIPLE 3 – HANDLING AND STORAGE:

Protect workers and the environment during cyanide handling and storage.

Standard of 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.

☑ in full compliance with

The Operation is ☐ in substantial compliance with Standard of Practice 3.1
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

SDGM continues to maintain records of design compliance with relevant construction standards and statutory approval requirements. The design and construction of the unloading and storage facilities remains compliant with this Standard of Practice.

Some changes have occurred within the unloading, storage and mixing facility during the certification period. It is noted that SDGM has installed a new Liquid Sodium Cyanide Day tank within the existing facility to replace the deteriorated previous tank, and attained approval with the local jurisdiction (Department of Mines and Petroleum – Government of Western Australia).

The unloading and storage facilities remain strategically located away from people and surface waters. The storage area has adequate ventilation and the cyanide is stored securely, and away from other incompatible chemicals.

Liquid cyanide is unloaded on a concrete surface that can minimize seepage to the subsurface.

The cyanide unloading area is designed and constructed to contain, recover or allow remediation of any leakage from the tanker truck, with a sloped concrete platform draining to a concrete bund containing a sump pump for remediation.

Several layers of protection exist to prevent overfilling of cyanide storage tanks, including multiple level indicators, high-level alarms, and inspection/observation procedures.
Cyanide mixing and storage tanks are located on a concrete surface that can prevent seepage to the subsurface.

The operation continues annual third party (Cyanide Producer) inspections of unloading, transfer and storage facilities to ensure that the condition and design of facilities is maintained within accepted specifications and statutory requirements. It is noted that the scope of these inspections has been expanded and is now more comprehensive than previous.

SDGM continues to conduct inspections of the integrity and functionality of the unloading and storage facilities to ensure design standards are maintained and continues to carry out maintenance works as required on concrete foundations, concrete secondary containments and fixed plant such as tanks, pumps, pipelines, and level detection instrumentation. SDGM utilises a preventative maintenance system and schedules inspections and works at appropriate intervals.

**Standard of Practice 3.2:**

Operate unloading, storage and mixing facilities using inspections, preventive maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.

- ✅ in full compliance with

The Operation is

- ☐ in substantial compliance with
- ☐ not in compliance with

**Summarize the basis for this Finding/Deficiencies Identified:**

SDGM continues to solely utilise liquid sodium cyanide for processing requirements. Cyanide is stored with adequate ventilation to prevent the build-up of hydrogen cyanide gas.

The liquid cyanide storage tanks are of mild steel construction and fully roofed, and located off the ground on solid concrete plinths, with a surrounding concrete secondary containment bund, to minimise the potential for contact with water.
Cyanide is stored in a secure fenced compound, with warning signs and access via a locked entry gate.

Cyanide is stored separately from incompatible materials such as acids, strong oxidizers and explosives and apart from foods, animal feeds and tobacco products. The storage tanks are located within a concrete secondary containment area with appropriate bund walls to prevent potential mixing.

Delivery procedures require tanker and isotainer flushing and wash-down within the designated unloading area prior to the tanker leaving site. An observer (Spotter) is required to observe and supervise the unloading procedure and activities are documented by both the Spotter and the delivery driver.

The site received only liquid sodium cyanide in 18 cubic metre Isotainers, thus there is no handling or stacking of containers.

SDGM continues to implement appropriate cyanide unloading procedures, including safety and personal protective equipment (PPE) requirements, permit to work, cyanide emergency response, cyanide spill response, and cyanide delivery completion confirmation. Examples of completed documents, including cyanide delivery completion confirmation, were sighted during the audit.

Personnel interviewed demonstrated a strong understanding of cyanide handling and cyanide unloading procedures and this knowledge was consistent with SDGM written procedures and work instructions.
PRINCIPLE 4 – OPERATIONS:

Manage cyanide process solutions and waste streams to protect human health and the environment.

**Standard of Practice 4.1:**

Implement management and operating systems designed to protect human health and the environment utilizing contingency planning and inspection and preventive maintenance procedures.

- ☑ in full compliance with

The Operation is
- □ in substantial compliance with Standard of Practice 4.1
- □ not in compliance with

**Summarize the basis for this Finding/Deficiencies Identified:**

SDGM implements management and operating systems designed to protect human health and the environment and utilises contingency planning, inspection, and preventative maintenance systems and procedures to protect human health and the environment.

SDGM utilises a Sustainability Management System (SMS), with an electronic filing and access portal for operating plans, procedures, work instructions and related documents.

SDGM continues to utilise a Cyanide Management Plan (CMP) as a central source of information and implementation of all cyanide-related aspects of site cyanide management. The plan references a comprehensive range of operating plans, standard operating practices, work instructions, maintenance procedures, and inspection log sheets.

Cyanide procedures include: unloading and delivery procedures, multiple operating procedures for unit processes within the SDGM processing plant, TSF operation, operating and maintenance procedures for equipment, spillage and emergency response, cyanide monitoring, wildlife monitoring, spill remediation, cyanide dosing and monitoring, tank drainage and inspection, equipment flushing and decontamination, cyanide analysis, hydrogen cyanide (HCN) gas monitoring and water sampling and monitoring.
Design storm events management of water and solutions is documented in several management documents, including the Water Management Plan, Water Balance, CTD TSF Operating Manual, and Flood Management Plan. SDGM maintains records of design criteria for cyanide facilities such as the Processing Plant and TSF. SDGM continues to manage wildlife protection to design, regulatory and Code requirements, including the central-thickened discharge tailings system technical reports and subsequent requisite operating conditions, and the Water Management Plan.

SDGM implements a comprehensive range of appropriately documented operational and maintenance inspections to ensure safe and environmentally sound operation of cyanide facilities and retains records of these inspections. Scheduled Inspections include: unloading and delivery area inspections, Processing Plant unit process (multiple) inspections, CTD and process pond inspections, reagents area inspections, multiple wildlife inspections, borefields inspections, and cyanide response equipment inspections. A range of completed inspection forms was sighted during the audit.

Maintenance inspections are coordinated and recorded via a comprehensive preventative maintenance system. A range of cyanide-related maintenance inspections, work orders, and close-out reports was sighted during the audit.

SDGM continues to utilise a change management system to evaluate cyanide-related requirements for items including operating procedures, drawings, equipment and fixed plant alterations or upgrades. The system includes a Procedure, Hazard Checklist, and Change Request and Approval form.


The CTD TSF Operation Manual details contingency procedures in the event of an upset in the water balance, when inspections and monitoring identify a deviation from design or standard operating procedures, or when a temporary closure or cessation of operations may be necessary.

The SDGM electrical power station has design generator redundancy to accommodate power interruption.

SDGM maintains 3 power stations (1 diesel fired and 2 LNG fired) with a total of 26 separate generator sets (11 diesel & 15 LNG) providing for significant redundancy. LNG is supplied to the power station via the Eastern Goldfields Pipeline.

Detailed Maintenance and testing records for Power Generators are kept at SDGM, and were provided for inspection.
Standard of Practice 4.2:

Introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings.

☑ in full compliance with

☐ in substantial compliance with Standard of Practice 4.2

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

SDGM utilises routine testwork systems and standard operating procedures to optimise cyanide addition rates. The Operation utilises both automatic on-line analysis and manual analysis to monitor and optimise cyanide addition rates. A range of standard tests and analysis is routinely undertaken to ensure cyanide use is minimised, including pH buffer testwork, ore leach and reagent consumption testwork and CIL circuit surveys.

Lime is added to the leach process to provide protective alkalinity, thus minimising cyanide consumption and generation of HCN gas.

Ore sources scheduled for Processing Plant treatment are assessed for pH and cyanide reagent requirements prior to treatment and blending strategies are used to minimise cyanide consumption.

SDGM metallurgists review cyanide optimisation strategies daily to optimise leaching conditions. Parameters evaluated include: pH, free and weak acid dissociable (WAD) cyanide concentration, water salinity, residence time, dissolved oxygen concentration and slurry density.

Third party metallurgical testwork is undertaken to characterise potential new ore sources and for evaluation of leaching parameters and cyanide consumption.

Process personnel interviewed demonstrated a good understanding of cyanide measurement and process control and this understanding was consistent with SDGM procedures and work instructions.
**Standard of Practice 4.3:**

*Implement a comprehensive water management program to protect against unintentional releases.*

- [x] in full compliance with
- [ ] in substantial compliance with
- [ ] not in compliance with

**Summarize the basis for this Finding/Deficiencies Identified:**

SDGM continues to implement a comprehensive water management program, utilising a number of complementary management plans, operating manuals and standard operating procedures. Key overarching documents include a Probabilistic Water Balance, Water Management Plan and Flood Management Plan, within which storage capacity and freeboard are stipulated.

The SDGM Cyanide Management Plan references these documents and summarises the management strategy and procedures to ensure compliance with Code requirements.

The CTD TSF, a significant catchment area, is subject to a third-party audit on an annual basis.

The comprehensive nature of the Probabilistic Water Balance includes management of water supply intake requirements for the borefields; CTD supernatant pond salinities and storage capacity of the CTD and other storages. It considers all key water storage facilities, tailings density, daily climate data, salinities and potable water requirements. The water balance has been developed and is maintained with specific reference to the requirements of the Code and of this Standard of Practice and is periodically reviewed by third party technical consultants.

SDGM continues to utilise a site water model to periodically review water management measures. The model considers storm duration and storm return intervals. The TSFs and decant/stormwater water pond design parameters are based upon containment for a 1 in 100 year, 72 hour rainfall event. An emergency spillway is provided to control the discharge of any excess water. The model was developed utilising 88 years of meteorological data from the nearby Laverton meteorological station and parameters are reviewed on the basis of monthly updated data and changes to design. The ponds and impoundments are designed and operated with...
adequate freeboard above the maximum design storage capacity determined to be necessary from water balance calculations.

During the certification period, SDGM developed a Flood Management Plan, with a stated intent of outlining current strategies in place to manage heavy rainfall events with potential for widespread flooding across site.

SDGM operated and maintained a site meteorological station during the certification period and measured and recorded precipitation during this period. Additionally, the water balance process at SDGM continues to require monthly entry of data from the Laverton meteorological station.

SDGM Operating procedures incorporate inspection and monitoring activities to implement the water balance and prevent overtopping of ponds and impoundments and unplanned discharge of cyanide solutions to the environment.

**Standard of Practice 4.4:**

*Implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.*

☑ in full compliance with

☐ in substantial compliance with Standard of Practice 4.4

☐ not in compliance with

**Summarize the basis for this Finding/Deficiencies Identified:**

SDGM continues to employ an alternative protection strategy for birds/wildlife on the tailings facility as WAD CN concentrations of water on the dam exceeded the 50 mg/L ICMI recommended protection limit. A peer reviewed technical study (Causational Report) to support the alternative bird/wildlife protection strategy was found fully compliant with the Code during the initial compliance audit.

The previous audit resulted in a corrective action plan to satisfy the requirements of this Standard of Practice. This corrective action plan was deemed complete by the auditor in a report dated 20 August 2014 and posted on the ICMI website. This corrective action plan included an updated Cyanide Management Plan with specific details for management in the scenario of loss of hypersalinity for prolonged periods.

No changes have been made to the recommended WAD cyanide levels discharged to the CTD since the 2013 recertification audit ((i.e. 100mg/L (80th percentile) and <125.5mg/L)).
The minimum salinity in tailings discharged to the CTD was reduced from 90,000 to 50,000mg/L following ICMI acceptance of a peer reviewed scientific study in June 2016. Three new recommendations were added to the list of eleven recommendations which must be managed by SDGM to maintain Code compliance.

SDGM conducts comprehensive monitoring of wildlife activity at the CTD facility and other open water storage facilities in accordance with the peer reviewed technical reports that support the alternative strategy for protection of wildlife at SDGM. The operation undertakes wildlife monitoring including specific monitoring for wildlife mortalities at the TSFs and the process water ponds.

Third party scientific experts conduct quarterly diurnal wildlife monitoring and monthly acoustic bat surveys.

CTD operating parameters and Peer Reviewer recommendations are reviewed and reported to SDGM on a quarterly basis by third party technical experts.

Bat Monitoring during the audit period demonstrated that bats appear to avoid and have minimal interactions with, SDGM’s hypersaline tailings system. Bat data is reported by third party experts on an annual basis.

Wildlife observation and monitoring results are consistent with previous findings and demonstrate that the risks to wildlife from cyanide in the CTD have not measurably changed.

The stormwater catchment capacity was increased in 2014 to facilitate improved handling of CTD run off water following large rainfall events.

SDGM continues to maintain an electrified fence around the perimeter of the CTD facility to prevent wildlife access.

Six wildlife deaths were reported during the certification period, of which none were attributed to cyanide poisoning. The monitoring results indicate that no wildlife mortalities have occurred as a result of exposure to cyanide solutions during the period of certification.
**Standard of Practice 4.5:**

Implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.

- ☑ in full compliance with

The Operation is

- ☐ in substantial compliance with
- ☐ not in compliance with

**Summarize the basis for this Finding/Deficiencies Identified:**

SDGM has no direct discharges to surface water from any defined cyanide facility. The mine has a licence to discharge de-watered mine water to the adjacent hypersaline salt lake (Lake Carey). The mine water system is distant from all cyanide facilities. As a precaution, SDGM routinely assays this discharge for several analytes including WAD CN, and reports these results to the applicable legislative jurisdiction and within the SDGM Annual Environmental Report. All results to date have been below the detection limit of 0.04mg/L WAD cyanide.

**Standard of Practice 4.6:**

Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of ground water.

- ☑ in full compliance with

The Operation is

- ☐ in substantial compliance with
- ☐ not in compliance with

**Summarize the basis for this Finding/Deficiencies Identified:**

SDGM continues to implement seepage management strategies, as documented within the Cyanide Management Plan and Water Management Plan.

This includes a comprehensive monitoring program using a network of monitoring bores, underdrainage, seepage interception trenches, and recovery bores. SDGM continues to apply an internal groundwater limit of 0.5mg/l WAD CN for the
protection of beneficial users of groundwater in accordance with appropriate water quality guidelines and licence conditions. Groundwater monitoring data continues to indicate no impacts from SDGM facilities, including the CTD, on identified beneficial groundwater users.

Beneficial uses of ground water remain stock water and potable water bores on the Mt Weld Pastoral Station, located approximately 6km from the SDGM Processing Plant and TSFs.

SDGM reports to the relevant jurisdiction, the Western Australian Government Department of Environmental Regulation, on defined monitoring locations on a quarterly basis and within their annual Environmental Report.

No mill tailings were utilised as underground backfill during the certification period.

**Standard of Practice 4.7:**

*Provide spill prevention or containment measures for process tanks and pipelines.*

☑ in full compliance with

☐ in substantial compliance with Standard of Practice 4.7

☐ not in compliance with

**Summarize the basis for this Finding/Deficiencies Identified:**

SDGM continues to undertake measures that effectively ensure adequate spill prevention and containment for unloading, storage, mixing and process solution tanks and process solution pipelines. These include concrete secondary containment with volumes sized to hold a volume greater than that of the largest tank within the containment and any piping draining back to the tank and with additional capacity for the design storm event. Other measures include inspections and preventative maintenance works for secondary containments, detailed written spill response procedures, use of secondary containment pipeline sheaths between traversed concrete bund areas and an emergency containment pond.

The CIL process tanks have concrete ring beam foundations with no impermeable barrier between them and the ground. SDGM has installed 4 monitoring bores in the vicinity of these tanks to complement the annual tank inspection program. Monitoring of these bores continues to be undertaken on a quarterly basis and results to date remain compliant and indicate no increases in WAD cyanide concentrations. In addition to the monitoring bores, SDGM employs a
comprehensive planned maintenance program for CIL process tanks, which are emptied and refurbished via inspection, sand-blasting and painted in sequence every 18 months.

SDGM continues to implement procedures during the certification period to prevent discharge to the environment of cyanide solutions that are collected in secondary containment, as documented in the Cyanide Management Plan and in specific spill response procedures.

A spillage event occurred during the certification period, resulting in discharge of 70 cubic metres of process solution to the emergency pond. This spill was adequately reported, documented, and appropriate response and remediation actions were taken, consistent with the SDGM Cyanide Management Plan and standard operating procedures.

SDGM cyanide tanks and pipelines are constructed of materials compatible with cyanide and high pH conditions.

SDGM has no direct discharges to surface water from any defined cyanide facility. The mine has a licence to discharge de‐watered mine water to the adjacent hypersaline salt lake (Lake Carey). The mine water system is distant from all cyanide facilities. As a precaution, SDGM routinely assays this discharge for several analytes including WAD CN, and reports these results to the applicable legislative jurisdiction and within the SDGM Annual Environmental Report. All results to date have been below the detection limit of 0.04mg/L WAD cyanide.
Standard of Practice 4.8:

Implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

☑ in full compliance with

The Operation is ☐ in substantial compliance with Standard of Practice 4.8
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

SDGM continues to maintain detailed quality assurance documents of cyanide facilities and modifications to existing facilities, including cyanide unloading, storage, mixing facilities and other cyanide facilities.

Documentation exists from construction reports that provide assurance that design standards have been achieved through material test results and inspections and the design has been reviewed by appropriately qualified personnel. This documentation includes welding procedures and qualifications, pressure testing, civil works, concrete analysis and geotechnical investigations.
Standard of Practice 4.9:

Implement monitoring programs to evaluate the effects of cyanide use on wildlife, surface and groundwater quality.

☐ in full compliance with

☐ in substantial compliance with Standard of Practice 4.9

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

SDGM continues to implement and review a range of written standard monitoring procedures as summarised in the Cyanide Management Plan. These include water and groundwater monitoring, process pond and TSF monitoring, processing plant unit process area monitoring and a range of wildlife monitoring procedures and activities.

The monitoring and sampling procedures include details for sampling, handling and chain of custody for water and process solutions, including groundwater and tailings slurry.

The sampling and analytical protocols have been developed by appropriately qualified personnel and taking into consideration licensing requirements and Australian Standards for sampling and monitoring, and in accordance with the National Association of Testing Authorities (NATA) for both sampling and analysis.

SDGM has incorporated effective quality control processes within its monitoring program to provide verification and reliance on monitoring results.

Monitoring frequency is based upon legislative licence conditions, expert third party advice and also upon operational learnings and Code auditing activities and recommendations.

SDGM continues to undertake twice daily inspections of the CTD tailings facility, which includes identification of wildlife activity and any observed mortalities. Wildlife observation training for SDGM personnel is conducted by third party experts and quality control processes are implemented to ensure effectiveness of the training.

Intensive third party wildlife monitoring is periodically carried out by established wildlife experts.
SDGM has no direct discharges to surface water from any defined cyanide facility. The mine has a licence to discharge de-watered mine water to the adjacent hypersaline salt lake (Lake Carey). The mine water system is distant from all cyanide facilities. As a precaution, SDGM routinely assays this discharge for several analytes including WAD CN, and reports these results to the applicable legislative jurisdiction and within the SDGM Annual Environmental Report. All results to date have been below the detection limit of 0.04mg/L WAD cyanide.
PRINCIPLE 5 – DECOMMISSIONING:

Protect communities and the environment from cyanide through development and implementation of decommissioning plans for cyanide facilities

Standard of Practice 5.1:

Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock.

☑ in full compliance with

☐ in substantial compliance with Standard of Practice 5.1

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

SDGM continues to maintain and revise its closure and decommissioning plans over the period of certification. These plans include the Processing Plant, TSFs and backfill plant.

A detailed decommissioning schedule has been developed and is periodically revised, including cyanide facility closure planning. The schedule identifies and chronologically details the necessary closure tasks.

The Cyanide Closure Plan (Appendix I of the Mine Closure Plan) was last revised in 2015. The plan includes details for decommissioning activities such as the drawdown of cyanide inventory, decontamination of equipment, contaminated site assessments, groundwater monitoring and management of seepage from the CTD.

SDGM continues to annually update cost estimates for closure and decommissioning.
Standard of Practice 5.2:

Establish an assurance mechanism capable of fully funding cyanide related decommissioning activities.

☑ in full compliance with

☐ in substantial compliance with Standard of Practice 5.2

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Financial provisions for decommissioning and closure have been developed. SDGM continues to revise decommissioning costs internally on an annual basis and a third party Consultant review of decommissioning costs is carried out triennially.

Based on the annual internal review of the approved financial mechanism, SDGM pays an annual Mine Rehabilitation Fee to the Western Australian Government mine regulator (Department of Mines and Petroleum) in accordance with statutory obligations.
**PRINCIPLE 6 – WORKER SAFETY:**

Protect workers’ health and safety from exposure to cyanide.

**Standard of Practice 6.1:**

Identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce or control them.

- ☑ in full compliance with
- □ in substantial compliance with
- □ not in compliance with

**Summarize the basis for this Finding/Deficiencies Identified:**

SDGM continues to maintain written procedures within its electronic document control system describing how cyanide related tasks are conducted in the field.

The SDGM Cyanide Management Plan continues to provide an overarching management framework that describes the operational controls and procedures in place at SDGM for minimising worker exposure to cyanide.

Operational controls have been identified on the basis of a systematic risk management approach and include opportunity for input from operational personnel and systematic review following incident occurrence.

These include controlled procedures for cyanide handling, unloading, dosing, monitoring, maintenance of equipment, flushing, decontamination and use of personal protective equipment (PPE). Further relevant procedures include pre-work inspections, confined space entry and emergency response requirements. SDGM effectively implements the procedures to minimise worker exposure during operational and maintenance activities. The cyanide handling and unloading procedures are consistent with the cyanide manufacturer’s (CSBP-AGR) recommended practices for prevention and of exposures and releases.

SDGM continues to implement its Management of Change procedure, which provides for both prevention of cyanide exposure to workers as well as prevention of cyanide releases to the environment. Changes to equipment, systems documentation or processes require personnel to complete a systematic assessment of the change to identify potential hazards and risks, including an assessment of...
health and safety risks. The Management of Change process requires sign off by appropriate SDGM technical and management personnel prior to the implementation of any change.

All new SDGM procedures are discussed at operator pre-start meetings and any feedback is incorporated in these procedures. A Document Control Form is used to record the names of personnel who have provided input into new procedures or updates to existing procedures. Examples of operator input to Health and Safety Procedures are recorded in safety meeting minutes and shift pre-start meeting notes.

Supervisors and Management personnel review procedures at regular scheduled update intervals.

**Standard of Practice 6.2:**

*Operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.*

- [ ] in full compliance with
- [ ] in substantial compliance with
- [ ] not in compliance with

**Summarize the basis for this Finding/Deficiencies Identified:**

SDGM continues to operate its CIL facilities in the pH range of 8.8 to 9.5 to limit the evolution of HCN gas. The hypersalinity of locally available bore water limits the practical extent to which the slurry pH can be elevated.

SDGM undertakes a number of routine testwork activities to optimise pH dosing and control, including buffer curve generation, process water salinity, process water specific gravity, protective alkalinity determination and lime consumption.

The SDGM Processing Plant utilises both manual and automatic pH measurement, with automatic pH probes installed within four CIL tanks. Automated control and lime dosing is implemented via process control instrumentation and dosing valves and displayed within the Plant Control operator interface system. The automated analysis is verified via manual pH determinations on a two hourly basis.

SDGM has previously identified specific HCN gas risk areas as the top of the CIL tanks, trash screens and the tailings thickener area. This has been expanded to include the carbon safety screens area. These areas have been identified as having
potential to expose workers to HCN gas in excess of this standard of practice. The HCN gas management strategy in these areas includes a combination of ambient monitors fitted with control room alarms, together with the requirement for all personnel entering these areas to carry a portable monitor and escape mask. In addition, static HCN monitoring instrumentation has been installed and is located at all identified risk areas.

HCN gas monitoring data appears on the Plant Control operator interface system and alarms are in place in the event of elevated HCN gas measurements. HCN gas levels are also manually monitored on a 12 hourly basis with the results recorded on the shift log sheet. HCN monitoring instrumentation is calibrated and maintained in accordance with manufactures’ specifications.

Due to specific risk analysis and in addition to existing controls, a local alarm is located at the carbon safety screen to indicate when the acid rinse cycle of the carbon elution sequence is in progress.

Warning signs are placed at appropriate locations where cyanide is used, including signs that prohibit smoking, eating, drinking, open flames, use of personal HCN monitors and use of suitable PPE. Signage was sighted whilst conducting field inspections during the audit, including the cyanide storage and unloading facility, CIL tank area, tailings thickener area and the entrance gate to the CTD tailings storage facility.

Low pressure combination eyewash station/ safety showers and dry powder fire extinguishers are located strategically within the SDGM Processing Plant. The units are subject to a program of regular inspection and preventative maintenance.

Storage tanks containing high strength (>1%) cyanide solution are identified by a painted lilac band. All piping carrying high strength cyanide solution is labelled “CYANIDE” and is painted lilac in colour. The “CYANIDE” label includes an arrow showing the flow direction.

SDGM maintains current English language MSDS and first aid procedures at strategic site locations.

In the event of cyanide exposure incidents, SDGM incident investigation procedures include the requirement to evaluate the sufficiency of operational controls, including procedures and training materials to protect worker health and safety and response to cyanide exposure.
Standard of Practice 6.3:

Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

☑ in full compliance with
☐ in substantial compliance with Standard of Practice 6.3
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

SDGM continues to maintain and implement emergency management plans and first aid procedures to respond to worker exposure to cyanide.

Potable water, oxygen (Oxy Sok) and resuscitators are located at the cyanide unloading and storage area. The cyanide antidote kit, which utilises Hydroxycobalamine, is stored in the nearby site first aid clinic. Audible alarms are established through the process plant to raise the alarm if high HCN gas or other emergencies are triggered, as well as local alarm displays within the Plant Control operator interface system. All personnel carry two-way radios so they can readily report on emergencies. Telephone communication is also available during cyanide unloading operations.

SDGM continues to maintain an onsite First Aid medical clinic which is staffed by a full time Registered Nurse (on 24 hour call). First aid equipment is inspected and maintained in accordance with manufacturers’ recommendations. Senior process personnel are provided with competency based training in the use of the cyanide antidote kit (in the event of first responder emergency scenarios).

The operation’s emergency response resources for cyanide incidents include a dedicated ambulance adjacent to the Processing Plant and a second ambulance at the nearby Underground Mine First Aid Clinic. The local hospital and medical providers have been notified of the potential for cyanide-related exposures and periodically participate in emergency mock drills.

SDGM continues to test Emergency Response capabilities through annual mock emergency drills which involve SDGM operations and emergency response personnel as well as external emergency response providers. Emergency Response Debriefs are conducted following each drill to highlight lessons learned and incorporate in response planning.
**PRINCIPLE 7 – EMERGENCY RESPONSE:**

*Manage Protect communities and the environment through the development of emergency response strategies and capabilities.*

**Standard of Practice 7.1:**

*Prepare detailed emergency response plans for potential cyanide releases.*

- ☑ in full compliance with

The Operation is
- ☐ in substantial compliance with
- ☐ not in compliance with

**Summarize the basis for this Finding/Deficiencies Identified:**

SDGM continues to maintain emergency response capability through its Emergency Management Plan (EMP) and Crisis Management Plan. These plans have been reviewed and revised where appropriate over the period of certification in response to changes to organisational structure, review of risk registers, specific risk analyses and outcomes from emergency drills.

The EMP includes 8 scenarios (including transportation) for the potential accidental release of cyanide, including 3 three scenarios relating to catastrophic cyanide releases as follows: pipe and tank rupture, fire and explosions and storage tank rupture. A flowchart for each potential cyanide failure scenario is included which provides decision-making guidance depending on the location of the incident, activation of an incident management team, evacuation, decontamination and recovery actions.

The Emergency Response Team (ERT) has an ERT Procedures Manual which provides details on response to cyanide incidents and cyanide related injuries.

SDGM has developed a separate Cyanide Emergency Response Procedure (CERP) for the SDGM lease and surrounding communities that provides guidance on responding to cyanide related emergencies and also for transportation emergencies. As transportation is off-site, emergency response would be coordinated and conducted by and under the supplier’s (AGR-CSBP’s) emergency management procedures with support from SDGM dependent on incident location.

No fixed cyanide destruction or recovery systems exist at SDGM.
**Standard of Practice 7.2:**

*Involve site personnel and stakeholders in the planning process.*

☑ in full compliance with

☐ in substantial compliance with  ☐ not in compliance with

**Summarize the basis for this Finding/Deficiencies Identified:**

SDGM schedules and conducts annual emergency drills involving cyanide. These drills are carried out as desktop or actual exercises with the involvement of its workforce and external agencies, including medical evacuation providers such as Medical Air and the Royal Flying Doctor Service (RFDS).

SDGM remains a member of the Local Emergency Management Committee (LEMC) which includes the Laverton Shire Council, Laverton Police, Fire and Emergency Services Authority of Western Australia (FESA), Laverton Hospital and local mining operations. LEMC members continue to be advised of operational and transport cyanide risks through formal communication of the emergency response plans and involvement with emergency planning exercises. Mutual Aid Agreements with nearby mining operations provide external resources for emergency response and also serve as opportunities to involve stakeholders in the cyanide emergency response planning process.

The operation’s personnel continue to be involved in the emergency planning process, including participation in annual Emergency Management Plan reviews and mock drill exercises.
**Standard of Practice 7.3:**

Designate appropriate personnel and commit necessary equipment and resources for emergency response.

- ☑ in full compliance with
- □ in substantial compliance with
- □ not in compliance with

**Summarize the basis for this Finding/Deficiencies Identified:**

SDGM’s Emergency Management Plan describes and identifies the roles, responsibilities and call out procedures for emergency response coordinators and team members. An Emergency Response Flowchart within the plan is utilised to clarify procedures.

The EMP requires appropriate training for emergency responders.

The On Scene Command Team (OSCT) is required to immediately respond to a cyanide related emergency. The ERT forms part of the OSCT. The ERT Captain reports to and receives guidance from the On Scene Commander (OSC). The Incident Management Team (IMT) provides support to the OSCT and through the Incident Controller manages all aspects of an emergency. The General Manager or deputy assumes the role of Incident Controller and has overall authority and responsibility.

The SDGM Emergency Management Plan utilises Duty Cards and Activation Packs to facilitate speed and effectiveness of response and clarification of roles and responsibilities.

SDGM continues to maintain a comprehensive range of emergency equipment and resources, details of which are provided in the Emergency Management Plan.

The EMP includes procedures to inspect emergency response equipment to ensure its availability.

SDGM continues to involve local response agencies, such as RFDS, nearby mine ERTs, and FESA in emergency response planning and drills.
**Standard of Practice 7.4:**

*Develop procedures for internal and external emergency notification and reporting.*

- ☑ in full compliance with

The Operation is  
- □ in substantial compliance with Standard of Practice 7.4  
- □ not in compliance with

**Summarize the basis for this Finding/Deficiencies Identified:**

SDGM’s Emergency Management Plan describes the requirement and procedures to notify external emergency support services, which includes notification of external support agencies such as the Royal Flying Doctor Service, Laverton Police, FESA, Laverton Hospital and the surrounding communities. The Emergency Response Plan contains a list of the internal and external emergency contacts, including details for the AGAA Crisis Management Team, key SDGM personnel (including offsite contact details), local and regional fire officers, police, hospitals, governmental agencies and departments and supplier/contractors. This list continues to be updated on a monthly basis.

The SDGM EMP contains communication protocols for media interaction and Next-of-Kin notification and management.

SDGM’s location is remote from communities so incidents occurring on-site would not affect or require communications with those communities.
Standard of Practice 7.5:

Incorporate into response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.

☑ in full compliance with

☐ in substantial compliance with Standard of Practice 7.5

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

SDGM’s ERT Procedures Manual contains procedures on the recovery and neutralisation of spilled materials containing cyanide and also management and disposal of contaminated soil and clean up materials.

Additional specific Operating Procedures and Work Instructions exist for cyanide spill response, including a Cyanide Emergency Spill Response Flowchart.

SDGM’s Emergency Management Plan identifies and describes the environmental considerations for a range of emergency scenarios including tailings release and cyanide spills. The Emergency Management Plan specifically describes the remediation actions, including material disposal, sampling, monitoring and reporting.

The remedial action section of the SDGM Cyanide Emergency Response Procedure (CERP) identifies the potential for adverse environmental impacts if ferrous sulphate enters a waterway or stormwater drain.

There are no drinking water supplies near SDGM that could come into contact with cyanide at the site.
**Standard of Practice 7.6:**

*Periodically evaluate response procedures and capabilities and revise them as needed.*

☑ in full compliance with

The Operation is □ in substantial compliance with Standard of Practice 7.6

☐ not in compliance with

**Summarize the basis for this Finding/Deficiencies Identified:**

SDGM’s Emergency Management Plan includes the requirement for an annual review, with the most recent review occurring in August 2016.

SDGM continues to schedule and conduct annual emergency drills involving cyanide. The drills are scheduled by the Emergency Response Coordinator. The emergency response drill records included a debriefing to discuss lessons learned and include provisions for updating or revising the emergency plans.

All new SDGM procedures are discussed at operator pre-start meetings and any feedback is incorporated in these procedures. A Document Control Form is used to record the names of personnel who have provided input into new procedures or updates to existing procedures. Examples of operator input to Health and Safety Procedures are recorded in safety meeting minutes and shift pre-start meeting notes.

Supervisors and Management personnel review procedures at regular scheduled update intervals.

During the recertification period, no cyanide related emergency occurred and as such no changes to the SDGM EMP were made as a result of a cyanide related emergency. The last recorded cyanide related emergency occurred in October 2013.
PRINCIPLE 8 – TRAINING:

Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.

Standard of Practice 8.1:

Train workers to understand the hazards associated with cyanide use.

☑ in full compliance with
☐ in substantial compliance with Standard of Practice 8.1
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

All employees and contractors who visit or undertake any work at SDGM must complete the General Site Induction which includes basic cyanide awareness, first aid, emergency response and hazard recognition. SDGM continues to maintain records of all personnel who have completed the General Induction and when refresher training is due to be completed.

SDGM Process plant employees, maintenance, environmental and warehouse personnel as well as emergency response team members must complete a Plant Induction which includes more detailed training in Cyanide Awareness. This training includes information on liquid sodium cyanide, the health effects of cyanide, first aid, spill response, cyanide hazard awareness, emergency response, symptoms of cyanide exposure and procedures to follow in the event of exposure. The course also includes supplementary information from the current cyanide supplier (AGR). The training is mandatory and must be refreshed annually.

Visitors to the SDGM site must complete a short induction which includes hazardous materials, emergency response, basic cyanide awareness and first aid. No visitors are allowed to enter the process plant unless accompanied by a competent SDGM employee. SDGM contractors are controlled through site access permits which include the need for General Inductions to be completed before work can commence.
Standard of Practice 8.2:

Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment.

☑ in full compliance with

The Operation is ☐ in substantial compliance with ☐ not in compliance with Standard of Practice 8.2

Summarize the basis for this Finding/Deficiencies Identified:

The SDGM processing plant continues to maintain a training matrix which identifies and tracks the training required and completed by Processing and Maintenance personnel to undertake cyanide related tasks in a manner that protects human health and the environment.

Cyanide Awareness refresher training occurs on an annual basis for processing, maintenance, warehouse, environmental and ERT members, and the effectiveness of the training is evaluated.

Training programs are developed by work area and include cyanide delivery, CIL and leach operations, control room operations, water management, tailings management, pump operations, unplanned shutdowns, permits to work, isolation and tagging, HCN gas monitoring, cyanide spill response and sampling. Training materials for specific process related tasks include necessary elements to minimise risk to worker safety and prevent unplanned cyanide release.

SDGM continues to record and monitor completion of training for each individual employee that works in the Processing Plant. Personnel who are not recorded as competent for specific work tasks must be supervised by a competent operator until training and Verification of Competency (VOC) in that work task is completed.

The SDGM Processing Plant trainers hold formal qualifications in training and assessment. Risk assessments are completed for cyanide related tasks on a periodic basis to assess the effectiveness of training modules in controlling safety and environmental risks.

Task observations and safety discussions are undertaken formally and informally by Supervisors and Training Assessors.

SDGM continues to adequately maintain training competencies and assessment records over the period of certification.
**Standard of Practice 8.3:**

*Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.*

- ☑ in full compliance with
- □ in substantial compliance with Standard of Practice 8.3
- □ not in compliance with

**Summarize the basis for this Finding/Deficiencies Identified:**

All process plant and maintenance personnel, including those involved in cyanide unloading and mixing are required to undertake annual cyanide awareness training which includes emergency response aspects such as basic first aid, spill response, spill clean-up and use of PPE.

SDGM continues to maintain a training matrix for Emergency Response Team members which includes training in hazardous materials and cyanide incidents. Verification of competency is required in first aid, advanced resuscitation, cyanide awareness, regenerative breathing apparatus and breathing apparatus open circuit. The Emergency Response Team members undergo weekly training sessions which periodically include cyanide related scenarios. They are trained in mock drills involving cyanide which are designed to include process plant and maintenance employees as well as first aid personnel. Drills are undertaken for scenarios listed in the SDGM Cyanide Emergency Response Procedure which cover both worker exposures and environmental releases.

Emergency Response Team competency is enhanced by participation in Mines Rescue Competitions.

SDGM continues to maintain training and assessment records for Emergency Response Team members.

Processing department personnel participate in cyanide related mock drill exercises on a periodic basis. Periodic mock drill exercises are undertaken for all departments/areas site wide, including Processing, Maintenance and Emergency Response Team personnel and records are maintained.

SDGM continues to inform off-site emergency response agencies, such as RFDS, nearby mine ERTs and FESA, of relevant cyanide related elements of the Emergency Response Plan via the Local Emergency Management Committee.
Evaluation of cyanide related emergency response mock drills is conducted via Emergency Response Debrief Reports.
PRINCIPLE 9 – DIALOGUE:

Engage in public consultation and disclosure.

Standard of Practice 9.1:

Provide stakeholders the opportunity to communicate issues of concern.

☑ in full compliance with
☐ in substantial compliance with Standard of Practice 9.1
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

SDGM continues to implement its Community and Stakeholder Management Plan, which identifies stakeholders and means of engagement.

Key stakeholders identified include the Shire of Laverton, local pastoralists, State government regulators (DMP and DER) and indigenous communities.

AngloGold Ashanti operates offices in Kalgoorlie and Laverton to facilitate dialogue with local community members. Site contact details are available on the AngloGold Ashanti website for queries or questions on the SDGM operation.

A cyanide information sheet is provided to community members during mine site Open Days and includes contact details and phone numbers to allow members of the public to raise issues.

AngloGold Ashanti operates offices in Kalgoorlie and Laverton to facilitate dialogue with local community members. The Community Relations Advisor attends the Laverton office for 2 weeks every month.

The Shire of Laverton holds six monthly Mining Liaison Meetings with industry which includes updates from mining companies, community organisations and the Western Australian Government regulators. These meetings are attended by the SDGM General Manager and the AngloGold Ashanti Community Relations Advisor.

SDGM continues to record community concerns and reportable incidents within site systems.
Standard of Practice 9.2:

Initiate dialogue describing cyanide management procedures and responsively address identified concerns.

☑ in full compliance with

☐ in substantial compliance with  ☐ not in compliance with  Standard of Practice 9.2

Summarize the basis for this Finding/Deficiencies Identified:

The six monthly Shire of Laverton Mining Liaison Meetings and SDGM Open Days provide opportunities for stakeholder interaction. SDGM continues to maintain records of these meetings. A cyanide information sheet is available on the AngloGold Ashanti website and provided to community members during mine site Open Days. The information provided includes contact details and phone numbers to allow members of the public and local communities to raise issues.

A Community Relations Advisor is in attendance in the Laverton office for 2 weeks each month and is available to answer queries and interact with stakeholders.

SDGM continues to provide operational and environmental information regarding cyanide via the annual Online Sustainability Report posted on the AGAA website. This includes details of reportable cyanide incidents.
**Standard of Practice 9.3:**

*Make appropriate operational and environmental information regarding cyanide available to stakeholders.*

- [x] in full compliance with

The Operation is

- [ ] in substantial compliance with Standard of Practice 9.3
- [ ] not in compliance with

**Summarize the basis for this Finding/Deficiencies Identified:**

SDGM continues to make available to communities and other stakeholders a Cyanide Information brochure. The brochure is posted on the AngloGold Ashanti website, made available at SDGM Open Days and also upon request via the website and the Laverton and Perth offices.

Information on the operation is made available to the traditional elders of local indigenous communities and associations.

SDGM continues to disseminate information related to environmental and safety performance via annual sustainability reporting, which is publically available. Sustainability reports include details of cyanide related incidents at SDGM. A section of the report is devoted to cyanide management, including details of cyanide consumption, mine closure and any reportable environmental or safety incidents.

An externally reportable cyanide related incident occurred during the certification period involving release of process solution from a decant return pipeline in April 2016. Reporting was carried out in accordance with legislative requirements and SDGM management practices.