



SUSTAINABILITY
FUTURE GROWTH

**INTERNATIONAL CYANIDE MANAGEMENT CODE
GOLD MINING OPERATIONS**

GOLD FIELDS LIMITED: AGNEW GOLD MINE

**Agnew Gold Mine Recertification Audit
Summary Audit Report**

January 2020





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SUMMARY AUDIT REPORT

Name of Mine

Agnew Gold Mining Company Pty Ltd

Name of Mine Owner

Gold Fields Australia

Name of Mine Operator

Gold Fields Australia

Name of Responsible Manager

Tristan Freemantle, Processing and Engineering Manager

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Agnew Gold Mine
Name of Mine


Signature of Lead Auditor

17th January 2020
Date

LOCATION DETAIL AND DESCRIPTION OF OPERATION

The Agnew Gold Mining Company Pty Ltd (AGMC) site is located in the Eastern Goldfields region of Western Australia, approximately 630 km north east of Perth and 23km west of Leinster. The general climate of the Agnew region is described as arid. The mine, a wholly owned subsidiary of Gold Fields Australia which was acquired in 2001.

The processing plant has an annual throughput capacity of approximately 1.2Mtpa. It consists of a three-stage crushing circuit, two stage in-series ball milling circuit with two Knelson gravity concentrators, an in-line leach reactor and gravity electrowinning circuit. The carbon in pulp (CIP) circuit consists of air agitated Pachuca tanks, followed by a pressure Zadra elution circuit with carbon generation.

The tailings storage facilities (TSF) consist of TSF 2, an above ground paddock impoundment of approximately 53ha and with approximately 20.6Mt of deposition. TSF 2 is no longer an active tailings dam and is now being reclaimed to provide material for underground paste fill. TSF 3 is an in-pit facility utilising the Redeemer Pit approximately 6km south of the Agnew plant. TSF 3 was commissioned in 2004 and is only intermittently used since the commissioning of TSF 4 in 2017. TSF 4 is the second in-pit facility utilising the Songvang Pit and is located approximately 15km south of the Agnew plant. Supernatant water from TSF 3 and TSF 4 is returned to the processing plant via a series of TSF ponds and associated pumping equipment.

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.

Date(s) of Audit

Inclusive of the period from 26th - 28th August 2019.

Audit Company

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17th January 2020

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 and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Verification Auditors.

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.

Agnew Gold Mine
Name of Mine



Signature of Lead Auditor

17th January 2020
Date

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 Standard of Practice 1.1

not in compliance with

Basis for this Finding/Deficiencies Identified:

Agnew Gold Mining Company Pty Ltd (AGMC) is in Full Compliance with Standard of Practice 1.1.

Australian Gold Reagents Pty Ltd (AGR) supplies liquid sodium cyanide to AGMC from its Kwinana sodium cyanide production plant. AGR's Kwinana sodium cyanide production plant was recertified in full compliance with the ICMC on 3 August 2017.

During the period covered by this recertification audit all liquid sodium cyanide delivered to AGMC was sourced from AGR's Kwinana sodium cyanide production plant.

The Sodium Cyanide Supply Agreement between AGR and AGMC was renegotiated on 30 March 2017. The Commencement Date was nominated as 1 April 2017 and the Completion Date as 31 March 2022.

Prior to this Supply Agreement, the liquid sodium cyanide was also supplied by AGR from its Kwinana sodium cyanide production plant.

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

The operation is in substantial compliance with Standard of Practice 2.1

not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 2.1.

AGR was recertified as a Cyanide Producer on 3 August, 2017 and as a Cyanide Transporter on 26 September, 2016.

AGR changed its road transport subcontractor from Toll Mining Services to Qube Bulk Pty Ltd on 7 March, 2018.

ICMI allowed Qube Bulk Pty Ltd to operate under AGR's transport accreditation until the end of 2018.

Qube Bulk Pty Ltd was certified in full compliance with the ICMC on 29 November, 2018.

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

The operation is in substantial compliance with Standard of Practice 2.2

not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 2.2.

Australian Gold Reagents West Australian Supply Chain was recertified as fully compliant under the ICMC on 26 September, 2016.

The transport subcontractor, Qube Bulk Pty Ltd, was certified in full compliance with the ICMC on 29 November, 2018.

Chain of Custody records were reviewed during the audit to verify that the sodium cyanide solution was sourced from AGR Kwinana and transported by AGR's certified logistics chain.

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

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 3.1.

Facilities for unloading and storing cyanide have been designed and constructed in accordance with sound and accepted engineering practices.

The two cyanide unloading and storage tanks (wrap tanks) were provided by the cyanide supplier AGR. The facilities were designed and constructed in accordance with cyanide producers' guidelines, applicable jurisdictional rules and/or other sound and accepted engineering practices.

AGR supplied a Manufacturer's Data Report upon completion of the works which contained all required sign-off and QA/QC documentation confirming that the facilities were built to design.

The concrete truck unloading pad is appropriately contoured to direct any spillage and wash down solution to a sump in the tank compound. Concrete bunding surrounds the pad to prevent any spillage overflow. The unloading pad is located away from workers and surface waters.

The wrap tanks are fitted with high and low level alarms to prevent overtopping. The AGMC unloading and storage tank installation contains two 70kL, self-bunded wrap tanks. The wrap tanks are designed to contain cyanide leaks within the outer skin.

The wrap tanks are located in a secure, open area away from offices and workshops. The tanks are vented at the top to prevent the build-up of HCN gas. Vent gases discharge into water seal pots.

The sodium cyanide solution is stored in a bunded area separate from incompatible materials.

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 Standard of Practice 3.2

not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 3.2.

The operation does not hold empty cyanide containers on site. Sodium cyanide solution from AGR is delivered to site in isotainers that are transported via truck. The isotainers are emptied on arrival at site and are returned to the AGR Production facility to be refilled. They are not retained for any other purpose.

The operation has developed and implemented plans and procedures to prevent exposures and releases during cyanide unloading activities.

A procedure for delivery of sodium cyanide explains the tasks required when unloading sodium cyanide solution from AGR isotainers to the unloading tank and the transfer of cyanide from the unloading tank to the cyanide storage tank. The procedure includes the operation of all applicable valves and couplings.

Spillage or leakage is cleaned up immediately in accordance with site procedures. The cyanide unloading procedure requires a second person to be present for the duration of the cyanide unloading process. An observer's hut is strategically located so that the spotter can view the unloading process and stop the unloading process in an emergency or if an operational problem occurs. The observer's hut contains delivery documentation and associated inspection checklists and acts as a storage point for all PPE requirements.

Colorant dye is contained in each delivery of sodium cyanide solution supplied by AGR.

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

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 4.1.

The AGMC operations have effectively implemented management controls, including procedures, manuals, task instructions and maintenance systems to ensure protection of health and the environment from its use of cyanide. The operation has continued to implement and regularly review its documented management systems for all aspects of cyanide management, including contingency requirements due to upset conditions.

The development and rollout of a new Cyanide Management Plan and Change Management Procedure have improved the ability of the site to manage and control the use of cyanide at AGMC. The Change Management Procedure requires sign off by environmental and safety personnel when the risk potential is assessed as moderate or higher.

Documented procedures are revised when changes have occurred to cyanide facilities such as the introduction of hydrogen peroxide to the CIP tails to ensure that Weak Acid Dissociable (WAD) cyanide concentrations at the TSF spigot are maintained below 50 mg/L WAD cyanide. The in-pit tailings disposal at AGMC is effectively managed through documented operating systems to ensure minimum freeboard requirements and to maintain cyanide concentrations below operating limits designed to protect wildlife.

The operation uses the SAP preventative maintenance system that facilitates regular maintenance and inspection of cyanide facilities including tanks, pipelines, holding ponds, instrumentation and emergency response equipment. Records were effectively maintained for inspection and maintenance at AGMC over the period of certification. The auditors consider that the current operational inspection frequencies are sufficient to assure and document that the cyanide facilities are functioning within design parameters.

Contingency actions and procedures are contained in operating and training documents relevant to each area of operation. Troubleshooting guides list faults and possible causes and suggested actions are contained in the area operating manuals. The contingency

procedures include situations when temporary closure or cessation of operations may be necessary

Site power is provided by TransAlta, an external energy supplier. TransAlta operates two backup generators in the event of the loss of the main gas fired power station. The two backup generators are capable of operating pumps and other equipment necessary to prevent unintentional releases and exposures. TransAlta performs routine maintenance and testing of the two backup generators.

Emergency power capability is available and is used to operate only nominated equipment.

Tailings lines and tailings flushing water can be operated on emergency power if required. Safety shower diesel pumps operate automatically in the event of a power failure at the processing plant. A mobile compressor is available to provide air agitation to the leach and adsorption tanks in the event of a power failure.

The pumps, mobile compressors and mobile generators are inspected and maintained on a weekly basis.

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

The operation is in substantial compliance with Standard of Practice 4.2

not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 4.2.

AGMC has continued to optimise cyanide use through blending of ore, the introduction of online monitoring and control of free cyanide concentration in the leach circuit and online monitoring of WAD cyanide in the adsorption circuit.

The introduction of hydrogen peroxide to the tailings hopper has ensured that cyanide levels discharged to the TSF are less than 50mg/L WAD cyanide.

Cyanide addition to the elution circuit and inline leach reactor continues to be sequence controlled in the Citect distributed control system.

Standard of Practice 4.3

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

in full compliance with
The operation is in substantial compliance with Standard of Practice 4.3
 not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 4.3.

AGMC implements a comprehensive, probabilistic water balance that is modelled in the GoldSim software. The water balance incorporates all major slurry and water flows between the processing plant, tailings storage facilities and borefields.

Quarterly tailings storage facility surveys include the calculation of remaining tailings and water storage capacities and these measurements are incorporated in the water balance model.

The water balance model includes the ability to model storm events and pump failures. Rainfall volumes and storm and pump failure duration parameters can be adjusted to model various scenarios.

The water balance model is updated quarterly with tailings storage facility and water storage survey results.

The water balance considers the following:

- A design storm duration and storm return interval that provides a sufficient degree of probability that overtopping of the pond or impoundment can be prevented during the operational life of the facility
- The amount of precipitation entering a pond or impoundment resulting from surface run-on from the upgradient watershed, including adjustments as necessary to account for differences in elevation and for infiltration of the runoff into the ground
- Solution losses in addition to evaporation, such as the capacity of the decant, drainage and recycling systems, allowable seepage to the subsurface, and allowable discharges to surface water

Operating procedures require tailings facility and process water dam inspections. The inspections are recorded and include checks of tailings and process water pipelines for leaks and damage, bunding condition and freeboard capacity in each active tailings storage facility and process water pond.

There were no recorded instances of overtopping of ponds or tailings storage facilities during the recertification audit period.

The operation measures precipitation and compares the results to design assumptions and revises operating practices as necessary. Rainfall data is gathered from the Leinster Airport. Rainfall data is reviewed during the annual TSF audit and compared to design criteria. The most recent annual TSF audit determined that the amount of tails dam return water pumped was in line with expectations and that there was no requirement to change design assumptions in the model.

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

The operation is in substantial compliance with Standard of Practice 4.4

not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 4.4.

The operation has managed cyanide concentrations in open water to prevent impacts to wildlife through maintaining surface waters below 50 mg/l WAD CN except for 7 isolated short terms events over the 3-year certification period when immediate actions were taken in accordance with procedures to rectify high cyanide concentrations including implementation of measures to protect wildlife.

The most notable event occurred in January 2017 during commissioning of the hydrogen peroxide addition system and the changeover of in-pit tailings disposal from TSF3 to TSF4. Over a 5 day period WAD cyanide levels in TSF3 exceeded 50mg/L WAD cyanide.

Two bird fatalities were recorded during the recertification audit period. One resulted from a bird flying in the path of a site vehicle (16/03/2017) and the other was a swan found in the Songvang Pit prior to the introduction of tailings (13/12/2017).

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 Standard of Practice 4.5

not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 4.5.

There is no direct discharge from the AGMC operations to surface waters. The operation has a negative water balance whereby all available process tailings water is returned from the Redeemer and Songvang in pit tailings storage facilities to the process plant for re-use.

The nearest surface water body is the Gascoyne River approximately 500km away.

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 Standard of Practice 4.6

not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 4.6.

The operation has a Ground and Surface Water Management Plan which outlines the monitoring, training and reporting requirements for ground and surface water management. The Plan addresses groundwater abstraction, groundwater contamination, water course erosion and contamination of surface waters.

The Agnew Department of Environment Regulation Licence 4611/1987/11 stipulates that monitoring of ambient groundwater WAD cyanide concentration takes place every six months with a maximum limit of 0.5mg/L.

AGMC monitors seepage from tailings storage facilities, tailings return water ponds and operational processing facilities including facilities no longer in use, to detect for contamination of groundwater.

Cyanide concentrations remain below the established statutory limit of 0.5mg/l WAD cyanide at all monitoring locations.

All tailings return water storage ponds are lined with HDPE liners and all cyanide facilities within the process plant are equipped with concrete secondary containment to ensure the protection of groundwater quality.

Dried tailings from TSF2 are used for underground mine paste backfill. The dried tailings have been analysed for WAD cyanide with results showing no detection.

Underground workers have been monitored for HCN gas exposure with results again showing no detection.

AGMC has demonstrated that the paste backfill material poses no risk to workers or the environment.

Standard of Practice 4.7

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

in full compliance with

The operation is in substantial compliance with Standard of Practice 4.7

not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 4.7.

All process tanks containing cyanide in the gravity, leach, adsorption, elution and electrowinning areas are contained within concrete bunding capable of holding more than 110% of the volume of the largest tank (LT1) within the containment as well as any piping that would drain back to the tank and additional capacity for the design storm event.

The Cyanide Loading Tank and Cyanide Process Tank are both self-bunded wrap tanks constructed by the cyanide supplier AGR. Each tank is contained within an outer wrap tank capable of holding a volume greater than the internal tank.

All pipelines containing cyanide are either located within bunded areas or are installed with appropriate spill containment launders.

The tailings and process water return pipelines have special protection to prevent the release of cyanide solutions to surface water. Both pipelines are equipped with flowmeters along the lines which can detect flow rate differentials indicating possible pipeline leaks.

Cyanide tanks and pipelines are constructed of materials compatible with cyanide and high pH conditions. Most of the processing plant slurry pipelines, including the tailings and return water pipelines are constructed of HDPE. Cyanide solution piping is constructed in both mild steel and HDPE. Tanks containing cyanide slurry and solution are constructed of mild steel.

An external review of all cyanide facilities was conducted during the recertification audit period which confirmed that the capacities of all bunded areas and the materials used for construction of tanks and piping complied with Code requirements.

The Delivery of Cyanide procedure outlines the requirements for clean-up of spills during cyanide unloading.

The bunded areas are equipped with sump pumps and spillage within the bunds is returned to nominated process tanks. The Delivery of Cyanide procedure outlines the requirements for clean-up of spills during unloading. Routine area inspections are undertaken of all cyanide facilities and results are retained in the SAP preventative maintenance system.

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

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 4.8.

QA/QC programs were implemented during construction of cyanide facilities and verified during the previous recertification audits. Evidence that these documents are still available on site was confirmed during this audit.

During this audit period:

- ownership of the cyanide unloading and storage facility was transferred from the cyanide manufacturer (AGR) to AGMC and
- the TSF4 in pit tailings facility including associated pipe work and return water storage dams were commissioned

Appropriate quality control and quality assurance programs were implemented during construction of these facilities.

Quality control and assurance programs have addressed the suitability of materials and adequacy of soil compaction for earthworks and liners during the installation of the in-pit TSF4 facility including associated pipework and cyanide water return dams.

Documents were provided to support the fact that appropriately qualified personnel had reviewed the construction of these facilities and that they had been built as proposed and approved.

During the audit period Lycopodium was requested to complete an inspection of all cyanide facilities to ensure that there were no gaps in quality assurance documentation and, if so that continued operation within established parameters would protect against cyanide exposures and releases. All recommendations have been completed apart from the development of a revised set of P&ID's (piping and instrumentation diagrams) of the cyanide unloading, storage and reticulation for the existing process plant. These are scheduled for completion by December 2019.

Standard of Practice 4.9

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

in full compliance with

The operation is in substantial compliance with Standard of Practice 4.9

not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 4.9.

Written procedures have been developed for monitoring activities and include all groundwater and wildlife monitoring undertaken for cyanide related activities.

Monitoring plans and procedures have been developed by appropriately qualified and experienced environmental and chemistry professionals at AGMC and include chain of custody requirements. Qualifications include Bachelor of Science and Environmental Management degrees for technical staff and in excess of 10 years experience for senior environmental assistants. The Chain of Custody Task Instruction for Sample Analysis by ALS Environmental includes sampling requirements, preservation, chain of custody, shipping procedures to laboratory and the parameters required for analysis. Records demonstrating compliance with this instruction was sighted.

The field data forms for water and wildlife monitoring require that the environmental conditions including anthropogenic influences are recorded with the filed data. Completed forms were observed for accuracy and found to be compliant with requirements.

Wildlife mortalities are monitored for and recorded at the operation.

Two wildlife deaths within and nearby to cyanide facilities were recorded during the audit period. One was the result of a collision between a mine vehicle and a bird (16/03/2017) and the other was a dead swan found in the Songvang Pit prior to the introduction of tailings (13/12/2017).

The frequency of monitoring of water quality in surface and groundwater and frequency of inspection of tailings facilities is in accordance with the Agnew Department of Environment Regulation Licence 4611/1987/11.

The groundwater sampling program includes a comprehensive network of monitoring bore locations which is designed to identify any seepage from cyanide containing surface water ponds and tailings storage facilities. Five additional groundwater monitoring bores were developed around the Songvang in-pit tailings storage facility during the auditing period. Surrounding open pit voids containing surface water are also monitored for cyanide.

The frequencies of inspection are adequate and appropriate for the current level of risk associated with cyanide concentrations found in tailings and ground and surface waters.

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 the cyanide facilities to protect human health, wildlife and livestock.

in full compliance with

The operation is in substantial compliance with Standard of Practice 5.1

not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 5.1.

The operation has developed written procedures in the form of an overarching Mine Closure Plan. The Plan includes high level elements of closure planning such as processing facilities, pipelines, ponds and tailings storage facilities.

Detailed area decommissioning plans have been written for cyanide facilities including the Emu processing plant, return water ponds and the Redeemer and Songvang in-pit tailings storage facilities.

The Mine Closure Plan includes a high-level schedule for the decommissioning of cyanide processing facilities, including the Emu Plant and associated tailings storage facilities.

The detailed area decommissioning procedures include a sequence and schedule for the Emu Plant, Process Water Return Ponds and the Redeemer and Songvang tailings storage facilities.

The Mine Closure Plan is reviewed on a three yearly basis as required by the Department of Mines, Industry Regulation and Safety (DMIIRS). The most recent Mine Closure Plan was submitted to the DMIRS in 2017.


Area specific decommissioning procedures are scheduled for review every two years. The most recent review and update was completed in August 2019.

Standard of Practice 5.2

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

in full compliance with

Agnew Gold Mine
Name of Mine


Signature of Lead Auditor

17th January 2020
Date

The operation is in substantial compliance with Standard of Practice 5.2
 not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 5.2.

A mine closure cost model has been developed by external consultants using the Standardised Reclamation Cost Estimator (SCRE) forecasting tool applied to all mine closure activities including cyanide decommissioning. The closure cost estimate is developed on the basis of a third party undertaking the cyanide-related decommissioning activities.

Within this cost model are specific allocations for decommissioning and decontamination of cyanide-related activities. Total closure costs are AUD69 million. Of this amount AUD17.2 million are allocated to cyanide related decommissioning activities which now includes the Lawlers Plant.

Mine closure costs are reviewed on an annual basis and an updated SCRE model is generated. Costs are signed off by designated site and regional based leadership teams.

AGMC is registered under the DMIRS's Mine Rehabilitation Fund (MRF).

DMIRS requires the submission of an annual levy to the MRF. The latest MRF contribution was submitted in 2019.

The ICMI has previously advised that it has assessed the MRF and found that it meets the intent of this Standard of Practice. As such, AGMC's contribution to this fund is sufficient to demonstrate Code compliance.

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 and control them.

in full compliance with

The operation is in substantial compliance with Standard of Practice 6.1

not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 6.1.

The operation has developed procedures describing how cyanide-related tasks such as unloading, plant operations, entry into confined spaces, and equipment decontamination prior to maintenance to minimise worker exposure. AGMC does not undertake mixing activities. AGMC has developed and implemented a safety management system that is certified to OSHAS18001. This consists of primarily three levels of documentation, standards (driven corporately), procedures / Plans and task instructions (developed locally). An example of this is in the area of confined space where there is a Corporate standard, a site-based procedure and work instructions for particular tank entries. The procedures and task instructions identify the hazards associated with the task and utilise the hierarchy of controls to ensure personal safety. The site also utilises Job Hazard Analysis (JHA) to define risks associated with a task to reduce worker risk.

The operation has developed Task Instructions (TI) that describe how cyanide-related tasks should be conducted to minimise worker exposure. The TIs are accessible as controlled documents by all personnel on site via the SharePoint application. The TIs are filed in accordance with the Processing area. Task instructions describe how to mitigate risk and includes personal protective equipment and specific pre-work inspection requirements. In addition to this, it is a requirement to do a take 5 risk assessment at the commencement of all tasks and this may initiate the need for a job hazard analysis (JHA).

SharePoint tracks the version history and allows the review period to be set. The review of the TI is managed by the Safety & Training Coordinator and the whole review process is overseen by Corporate.

A corporate Goldfields Australia (GFA) change management procedure has been rolled out at AGMC. Records of the implementation was sighted along with some cyanide related changes.

Worker input to site health and safety procedures is considered and documented during the following communication and consultation forums:

- Weekly area safety meeting (Toolbox)
- Daily pre-start meeting
- Weekly opinion leaders meeting (the opinion leaders are elected worker representatives)
- Monthly state of the nation presentation by the general Manager
- Monthly Site governance meeting (which includes Safety representatives and the site leadership team)

In addition to this, all workers participate in the conduct of safety interaction and safety observations, which provides an opportunity to comment on the efficacy of the systems.

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

The operation is in substantial compliance with Standard of Practice 6.2

not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 6.2.

The operation has determined that as per standard practice in the gold industry, a high pH will be used for limiting the evolution of hydrogen cyanide during operations. The pH targets were found to be set within the SCITECH control system. The pH is monitored via the pH probes in the plant. pH readings during the audit were verified as being consistent with the SCITECH settings. pH readings observed at the time of the audit as well as historical process data records sampled, found that the operations target pH levels for limiting the evolution of HCN were met.

The pH measurement was subject to calibrations scheduled within the maintenance system SAP as a maintenance task

The operation uses personal monitoring devices, ToxiPros, to confirm that controls are adequate to limit worker exposure to hydrogen cyanide gas of 10 ppm on an instantaneous basis and 4.7 ppm continuously over an 8-hour period. The operation has designated the area where HCN monitor and radio MUST be worn – this area is identified within the induction and is sign posted.

The ToxiPros are bump tested at the start of the "owner's" roster and sent offsite to GasTech Australia every 6 months for calibration. A fixed gas detector is present at the acid wash screen which is alarmed at 10ppm, as a back-up to the use of personal monitors. This detector is regularly inspected and calibrated.

The ToxiPro personal alarm setpoints are outlined in the Hydrogen Cyanide Gas Procedure. The ToxiPro HCN gas monitors used on site are set to trigger a warning alarm if the time weighted average (TWA) exceeds 4.7ppm and a danger alarm if the short-term exposure

limit (STEL) exceeds 10ppm. There is also a warning alarm at a short-term exposure of 4.7ppm.

The procedure details the actions required if high levels of HCN are recorded on a personal HCN monitor. These actions are briefly summarised below:

- Work **must not** take place if a HCN gas reading of **between 10ppm and 20ppm** is recorded without the use of a respirator with an appropriate cyanide canister filter attached.
- Work **must not** take place if a HCN gas reading of **greater than 20ppm** is recorded, except in the case of an emergency. If an emergency is called, entry is only permitted with self-contained breathing apparatus equipment used by trained and competent emergency response personnel.

The maintenance, testing and calibration requirements, both fixed and portable, are as required by the manufacturer and records are maintained for a period greater than one year.

The site inspection confirmed that warning signs, safety showers, eye wash station, fire extinguishers, pipe labels and MSDS's are all present, legible and in good working order as required. MSDS and signage was in the language of the workers, English.

The operation uses INX InControl as its action tracking system. Since January 2016, there have been no worker related cyanide incidents. A review of the incident management system indicated that it was being used appropriately and evidence of actions and close-out was available for reviewed non worker related cyanide incidents and for non-cyanide related worker safety incidents.

Standard of Practice 6.3

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

in full compliance with

The operation is in substantial compliance with Standard of Practice 6.3

not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 6.3.

The observer's hut at the unloading point and at the CIL control room has the emergency equipment such as oxygen gas, face masks/ breathing apparatus, alarm systems and means of communication. Breathing apparatus and gloves are also located at key points in the leach circuit. Two CN antidote kits (Cyanokit – Hydroxocobalamin) are stored at the medical

centre at the front gate. OxyViva equipment is available at strategic locations throughout the plant, including the operations control room.

Operators are in communication at all times through radio communications. Audible alarms are in place for emergency evacuation throughout the plant and high HCN concentrations at identified high-risk locations.

First aid and emergency response equipment is inspected and records of inspections are maintained in log sheets within the emergency response team facility and at the location of equipment. The CN antidote kits were also found to be checked to validate currency and storage conditions. Both kits were found to be current.

The operation has developed specific written emergency plans including plans for release of HCN gas, spills of cyanide solution and transport emergencies.

The Cyanide emergency management plan supplements the Agnew emergency response plan and provides specific procedures for containment, clean up and protection of human health and the environment.

Emergency Services Officers are onsite for all work shifts and are suitably qualified and authorised to provide first aid or medical assistance to workers exposed to cyanide. Cyanokits are only used when the patient is clearly deteriorating, despite oxygen administration, and there is a reasonable confidence that cyanide intoxication is the cause.

Procedures have been developed for transport of workers exposed to cyanide and local and regional hospitals are aware that cyanide is used on site and are familiar with response requirements.

Mock drills related to cyanide incidents are conducted on a regular basis and lessons learned are recorded in the action tracking database for follow-up.

PRINCIPLE 7 – EMERGENCY RESPONSE

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 Standard of Practice 7.1

not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 7.1.

The operation has developed specific written emergency plans including plans for release of HCN gas, spills of cyanide solution and transport emergencies, as applicable to site scenarios. The plan considers the specific response actions including evacuation of workers, notifications to any workers on mining areas nearby to the site, use of PPE, first aid applications, medical response, incident management, clean up, monitoring, investigation and the requirement for corrective/preventative actions.

Particular failure scenarios are captured within specific Pre- Incident Plans.

AGR, as the cyanide supplier, are responsible for transport of liquid NaCN from Kwinana to delivery into unloading point on the mine site. AGR's supply chain by road and rail to AGMC is fully certified to the ICMC Transport Protocols. The AGMC emergency response plan reflects transport responsibilities and includes details for notification to AGR for emergencies. It is noted that there are no external communities nearby that are likely to be affected by an incident.

Standard of Practice 7.2

Involve site personnel and stakeholders in the planning process.

in full compliance with

The operation is in substantial compliance with Standard of Practice 7.2

not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 7.2.

Stakeholders are represented on the local Emergency Management Area Committee (LEMAC) and are involved in the emergency response planning process.

LEMAC, led by Leinster Police, is the forum used to communicate emergency response processes to and receive feedback from external stakeholders.

It is noted that with AGMC's capability, there is limited requirement to utilise external response agencies for cyanide related incidents.

There are no communities, other than the mine site employees, in the immediate surrounds of the mine site. The town of Leinster is located some 21 km to the north east. The LEMAC facilitates consultation between AGMC and the community on issues of emergency response.

The operations workforce is involved in planning for emergency response. Members of the processing and maintenance teams are involved in the planning process through input into documented plans and procedures, participation in drills and through training and inductions.

In addition to this, the following formal communication and consultation forums are used to involve the workforce in the cyanide emergency response planning process:

- Weekly area safety meeting (Toolbox)
- Daily pre-start meeting
- Weekly opinion leaders meeting (the opinion leaders are elected worker representatives)
- Monthly state of the nation presentation by the General Manager
- Monthly Site governance meeting (which includes Safety representatives and the site leadership team)

Standard of Practice 7.3

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

in full compliance with

The operation is in substantial compliance with Standard of Practice 7.3

not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 7.3.

The cyanide related elements of the Emergency Response Plan consider all appropriate training, staffing levels, contact information and response duties related to the sites ability to respond to a cyanide emergency.

In particular with respect to human resources, the plans identifies:

- Primary and alternate emergency response Coordinators with the defined authority to commit required resources, and their duties and responsibilities

- Emergency team members and their duties and responsibilities
- Required training
- External resources and their roles
- Contact information

The plan articulates the required equipment and the associated inspection and maintenance procedures.

The plan also defines the call out procedures

The site Emergency Response Plan has been discussed with LEMAC, led by Leinster Police, which is the forum used to communicate emergency response processes to and receive feedback from external stakeholders.

Because of the in house capability and the limited external capability locally, there is limited need for external support for cyanide related incidents. Where a need arises, Agnew include outside entities in drills and exercises eg Royal flying Doctors (RFDS).

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

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 7.4.

The Cyanide Emergency Management plan refers to notifying external responders together with their contact details. The Cyanide emergency management plan is supported with memorandums of understanding.

The Cyanide Emergency Management Plan includes specific requirements and procedures to notify management, regulatory agencies and medical facilities and includes contact details including The Department of Mines, Department of Environment Regulation and the District Inspector of Mines, relevant managers and medical facilities.

The Cyanide Emergency Management Plan refers to the use of the LEMAC for communication with potentially affected communities. It is noted that with AGMC there is limited risk of affecting any community. The greatest risk relates to transportation incidents which is the responsibility of the supplier AGR who is certified as meeting the requirement of the code. The duty cards refer to communications with media.

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

The operation is in substantial compliance with Standard of Practice 7.5

not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 7.5.

The Cyanide Release Procedure does describe specific remediation measures that are required to response to cyanide spills. The procedure includes neutralisation, soil removal and disposal of contaminated materials and decontamination of equipment.

The Cyanide Emergency Management Plan includes the storage locations of ferrous sulphate on site. The plan includes a guide to the approximate quantities of ferrous sulphate required to neutralise cyanide as outlined below,

- 7 tonnes of ferrous sulphate neutralise the contents of one Isotainer (18 cubic metres).
- 1kg neutralises 2.5 litres of 30% sodium cyanide solution, or about 1 kg of ferrous sulphate per 0.9 kg of dry cyanide.

The plan includes a process for applying ferrous sulphate to an affected area and testing/repeating until the level of cyanide in contaminated soil is below 10ppm.

The groundwater at the site is not used for drinking water and there are no surface water bodies nearby to the operations. The Cyanide Emergency Management Plan prohibits the use of sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide where treatment may result in release to surface waters

The cyanide release procedure includes consideration of requirements to monitor soils, groundwater, HCN gas and wildlife in the event of an accidental cyanide release. Methods for monitoring are references in support procedures.

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

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 7.6.

AGMC's document management protocols require review of the Emergency Management Plan, The Cyanide Emergency Management plan, and associated procedures annually and the duty cards quarterly. All documents had been reviewed in accordance with the revision schedule and records of review are maintained in Sharepoint.

The Cyanide Emergency Management Plan includes reference to incident reporting, investigation and review after an incident. There were no cyanide related incidents requiring implementation of the Cyanide Emergency Management plan during the review period. The Cyanide Emergency Management plan refer to the frequency of mock drills. Cyanide emergency drills are planned to be done at least annually, The Emergency Services Offices (ESO) maintains records of regular mock drills, records indicate that drills have been conducted as planned. Record of each drill event are maintained in INX and they include recommendations for improvements or corrective actions.

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

The operation is in substantial compliance with Standard of Practice 8.1

not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 8.1.

The operation has a range of training related to cyanide hazard recognition for its employees who may encounter cyanide.

All employees who wish to enter the process plant area must complete a cyanide awareness induction. Gold Fields utilise the induction package created by the cyanide producer AGR for this purpose.

Employees who are required to work in the process plant area also receive the Mill Workers Induction, which contains additional information related to the use of cyanide on site.

The refresher training is managed via the Training matrix which is maintained by the Safety Training Coordinator for all departments. The matrix includes details of inductions, internal training courses and accredited training courses and the dates associated with attainment and renewal.

The cyanide refresher training is conducted annually and is available to taken online.

All hardcopy records of the inductions are kept by the Safety Training Coordinator who also coordinates the annual refresher training for all employees. Records were reviewed for employees during the audit period, where it was confirmed that refresher training was occurring annually as required.

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 Standard of Practice 8.2

not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 8.2.

The operation has designed and implemented a Process Training System based on the requirements of the nationally accredited Certificate III Processing.

Packages / modules are available for all areas including:

- Grinding operations
- CIP Circuit operations
- Elution circuit operations
- Reagents
- Gold-room operations
- Tailings management
- Crusher operations

All operators undertake specific theory and competency-based training with respect to the different process areas onsite. Training elements for each job are clearly identified in the training materials for each unit presented on site. The operators are required to be deemed competent following a practical assessment and a theory assessment, in an area before they work unsupervised or without their "buddy". The assessments are done by the Supervisor who is the content expert and the training staff who have a Certificate IV in Training and Assessment (TAE).

The training includes all the activities and tasks associated with work undertaken in these areas and utilises the procedures as the basis.

All training records are maintained both electronically and hard copy by the Safety Training Coordinator. The training matrix maintained by the Safety Training Coordinator records the status of assessment including dates achieved. The records include the names of the employee and the trainer, the date of training, the topics covered, and if the employee demonstrated an understanding of the training materials.

All employees who wish to enter the process plant area must complete a cyanide awareness induction. Gold Fields utilise the induction package created by the cyanide producer AGR for this purpose. Employees and contractors are required to undertake this prior to working with cyanide. Employees who are required to work in the process plant area also receive the Mill Workers Induction, which contains additional information related to the use of cyanide on site. Refresher training is done on an annual basis. This is managed via the Training matrix, which is maintained by the Safety Training Coordinator.

Standard of Practice 8.3

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

in full compliance with

The operation is in substantial compliance with Standard of Practice 8.3

not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 8.3.

Workers in cyanide unloading; reagents storage; processing and maintenance personnel are trained in working with cyanide including response to cyanide release. All operators undertake specific theory and competency-based training with respect to the different process areas onsite, including CIP and Reagents. The training includes all the activities and tasks associated with work undertaken in these areas, including the procedures to be followed if cyanide is released.

In addition to the annual AGR cyanide awareness training, The Processing departments Safety & Training Coordinator conducts yearly cyanide incident response training with the Mill Maintenance and Processing Department workforce. The training includes both theory and practical exercises. Copies of the training records are filed in the individual operator's training files and in the Safety & Training Coordinator's folders on the Agnew network drives. In addition to this, all Emergency response staff undertake HAZMAT response training twice a year.

Cyanide drills are conducted at least annually assessed and lessons learned fed into the continuous improvement process.

Training of the Emergency Management Team (EMT) for cyanide emergencies includes the use of response equipment, and is undertaken as part of the monthly scheduled training programme. Records of training are maintained. Hazmat training provided to the Emergency Response team members includes decontamination and first aid procedures. These procedures are also detailed in the Cyanide Release Procedure.

Offsite emergency responders are represented by a local committee - LEMAC, led by Leinster Police, which is the forum used to communicate emergency response processes to and receive feedback from external stakeholders.

Records are maintained in personnel files both in hard copy and electronically.

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

The operation is in substantial compliance with Standard of Practice 9.1

not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 9.1.

Despite being in a remote location with a limited range of stakeholders present, the operation does provide the opportunity for those stakeholders to communicate any concerns regarding the management of cyanide.

The primary opportunity for communication is via its participation in the Local Emergency Management Committee (LEMC) and direct communications with neighbouring pastoralists. Minutes of these meeting were observed during the audit.

A Community Complaint and Grievance Procedure has been developed and implemented.

Members of local indigenous groups are invited to site on an annual basis where presentations are made related to the use of cyanide. In addition to this, there was evidence of discussion with the local indigenous community at Directors meeting.

Standard of Practice 9.2

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

in full compliance with

The operation is in substantial compliance with Standard of Practice 9.2

not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 9.2.

Despite being in a remote location with a limited range of stakeholders present, the operation does provide the opportunity for those stakeholders to communicate any concerns regarding the management of cyanide.

The primary opportunity for communication is via its participation in the Local Emergency Management Committee (LEMC) and direct communications with neighbouring pastoralists. Minutes of these meeting were observed during the audit.

Members of local indigenous groups are invited to site on an annual basis where presentations are made related to the use of cyanide. In addition to this, there was evidence of discussion with the local indigenous community at Directors meeting.

Standard of Practice 9.3

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

in full compliance with

The operation is in substantial compliance with Standard of Practice 9.3

not in compliance with

Basis for this Finding/Deficiencies Identified:

AGMC is in Full Compliance with Standard of Practice 9.3.

Written descriptions of cyanide use have been developed and presented to stakeholders. Site open day presentations include discussion on cyanide management on site.

Minutes of LEMC meetings show that discussions were held on cyanide management on site. Information related to cyanide management has been tabled in the meetings.

The operation has determined that their stakeholders are literate and that dissemination of information in other forms is not required.

Gold Fields communicates its environmental and occupational health and safety performance annually through the integrated Annual Report and the Global Reporting Initiative (GRI). These reports contain details of safety and environmental incidents, including cyanide related incidents and incidents that result in statutory non compliances or investigations. In addition to this, AGMC is required to submit an Annual Environmental Report (AER) to the Western Australian Government Department of Water and Environment and Regulation, and the Department of Mines, Industry Regulation and Safety. The AER details all environmental incidents that occurred on AGM leases during the reporting period and cover items b) through to e) of this question. AER's are available on the Government Regulators' websites or via request, per the Freedom of Information Act 1992 (FOI Act).