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Cyanide Management Plan

Rio Tinto Winu

DOCUMENT TRACKING

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Status	Final
Version Number	V5
Last saved on	4 November 2024

This report should be cited as ‘Eco Logical Australia 2024. *Cyanide Management Plan*. Prepared for Rio Tinto.’

ACKNOWLEDGEMENTS

This document has been prepared by Eco Logical Australia Pty Ltd with support from Christopher Eason, Rio Tinto

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Template 2.8.1

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Abbreviations and definitions

Abbreviation	Description
Code	International Cyanide Management Code For the Manufacture, Transport, and Use of Cyanide In the Production of Gold
Cyanide facility	Items of infrastructure where workers have the potential to be exposed to WAD CN levels greater than 0.5ppm
DWER	Department of Water and Environmental Regulation
ELA	Eco Logical Australia Pty Ltd
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EP Act	<i>Environmental Protection Act 1986</i>
ICMI	International Cyanide Management Institute
The Project	Rio Tinto Winu Copper and Gold Project
CN	Cyanide
WAD	Weak Acid Dissociative
ppm	Parts per million
mg/L	Milligrams per litre
PLCs	Programmable Logic Controllers

Introduction

Background and scope

Rio Tinto Winu (RTW) plans to develop the Winu Copper and Gold Project (the Project), approximately 300 km south of Broome, and 320 km east of Port Hedland in the northern Pilbara region of Western Australia. The Project is located within a Development Envelope of approximately 37,344 ha. The Project involves developing an open pit that extends below water table (BWT) and associated infrastructure, including material waste and waste management infrastructure, processing facilities, mine dewatering infrastructure, water supply infrastructure, linear infrastructure and support facilities.

RTW plans to import cyanide to site in the form of solid briquettes, which will then be dissolved as required in a high-pH solution for use as a processing reagent. However, this is not expected to occur at initial project commencement. This management plan will be used to help guide project design and development but will only be enacted upon the commencement of carbon-in-leach (CIL).

Eco Logical Australia (ELA) has been engaged by RTW to develop a cyanide management plan to support the referral of its Winu Copper and Gold Project (The Project) under Part IV of the *Environmental Protection Act 1986* (EP Act) which is understood to be required for project environmental approval.

Management plan structure

This management plan follows the structure of the International Cyanide Management Institute (ICMI) Cyanide Code (the Code).

Each section includes:

- A transcription of each specific section of the Code that relates to Winu.
- A discussion of the significance to Winu.
- Actions and commitments in relation to that Section of the Code.
- Records that will be maintained to demonstrate compliance with that Section of the Code.

A consolidated table of actions and commitments is appended as Appendix A.

For this management plan, all items of infrastructure (including but not limited to) storage tanks and compounds, delivery lines, plant and TSF where workers have the potential to be exposed to Weak Acid Dissociable (WAD) cyanide levels >0.5 ppm will be deemed to be cyanide facilities.

This document will be reviewed prior to the commencement of operations and updated as required to ensure alignment with the Code.

Statutory requirements, compliance and the ICM

Legislation

Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) (Commonwealth)

The EPBC Act is Commonwealth legislation that protects Matters of National Environmental Significance (MNES). Where a development or activity has the potential to have a significant impact on an MNES, a referral is made to the Department of Climate Change, Energy, the Environment and Water (DCCEEW). An action must be referred if it 'has, will have or is likely to have a significant impact' on an MNES. The Minister or delegate determines whether the activity can proceed with no further assessment by the Commonwealth, or whether it will be a controlled action for which assessment is required.

MNES identified under the Act include:

- Nationally listed threatened species and ecological communities.
- Listed migratory species.
- Ramsar wetlands of international importance.

This may apply to cyanide management if an assessment concludes that it contributes to a threatening process for any MNES.

Environmental Protection Act 1986 (EP Act) and subsidiary legislation (Western Australia)

The EP Act is the primary environmental legislation for the State of Western Australia. It is comprised of several Parts, two of which are particularly relevant to cyanide management:

- Part IV (Environmental Impact Assessment) – Under this Part of the EP Act, the Environmental Protection Authority (EPA) assesses whether a proposal can be implemented in an environmentally acceptable manner and will publish a report to the Minister for Environment outlining its assessment. If the proposal is determined to be suitable for implementation, a Ministerial Statement will be issued with conditions of approval. Once approved under Part IV, the proposal will then be submitted to other regulatory agencies for their relevant approvals.
- Part V (Environmental Regulation) – Following approval under Part IV, the proponent will be required to obtain a works approval for construction of the mine and then a licence to operate, both of which are issued under Part V of the EP Act.

Various subsidiary legislation may also be relevant to cyanide management, but particularly reference is made to the *Environmental Protection (Controlled Waste) Regulations 2004*, which regulates the transportation of controlled substances including cyanide on Western Australian public roads.

Dangerous Goods Safety Act 2004 (DGS Act) (Western Australia) and subordinate legislation

A facility that stores above a threshold amount of material classified under the Australian Dangerous Goods Code is deemed a Dangerous Goods Site and requires a Dangerous Goods Site Licence to operate. The licensing threshold for sodium cyanide solution (NaCN) is 500 L, but licence conditions pertaining to

cyanide storage may also be triggered if storage of another classified substance exceeds the relevant threshold.

A Dangerous Goods Site Licence will contain conditions pertaining to the storage of all dangerous goods present at the premises. Conditions will usually reflect requirements specified in the relevant Australian Standards. The following Standards are of particular relevance for cyanide storage:

- AS4452 (The storage and handling of toxic substances)
- AS3833 (The storage and handling of mixed classes of dangerous goods in packages and intermediate bulk containers)

The subordinate *Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007* outline the administrative provisions related to Dangerous Goods Site Licences as well as establishing general duties for operators of Dangerous Goods Sites.

Dangerous Goods Sites may also be classified as Major Hazard Facilities if a higher licensing storage volume threshold is exceeded. For sodium cyanide this threshold is 20 tonnes. In addition to holding a Dangerous Goods Site Licence, operators of Major Hazard Facilities must:

- Prepare a risk assessment of the facility.
- Prepare and operate in accordance with a safety management system.
- Prepare and submit for approval a Safety Report that documents the outcomes of the risk assessment and details of the safety management system.

Work Health and Safety Act (WHS Act) (Western Australia)

The WHS Act establishes duties in relation to safe working practices, which are proactively enforced through workplace inspections and retroactively enforced through incident investigations.

The WHS Act is aimed at protecting the health and safety of employees and contractors and is administered by the Department of Energy Mines Industry Regulation and Safety (DEMIRS) Worksafe Division.

The subordinate *Work Health and Safety (Mines) Regulations 2022* provide additional occupational health and safety requirements in relation to mine sites. Chapter 7 of the Regulations establishes obligations in relation to the use of hazardous chemicals on mine sites, including cyanide.

Poisons Act 1964 (Poisons Act) (Western Australia)

The Poisons Act is administered by the Department of Health (DoH). Schedule 7 pertains specifically to cyanide and requires a licence or permit to be obtained from the DoH for the purchase, sale and use of cyanide.

Mining Act 1978 (Mining Act) (Western Australia)

The Mining Act is the primary legislation that regulates mining operations in Western Australia, both in terms of environmental protection and safety management. All mining operations are required to submit Mining Proposals to DEMIRS for any new activities, with an accompanying Mine Closure Plan.

An Annual Environment Report (AER) is required to be submitted and must follow a prescribed format, including progress reports against environmental outcomes specified in the Mining Proposal, including outcomes relevant to cyanide management.

Codes and agreements

International Cyanide Management Institute (ICMI)

The international Cyanide Management Institute (ICMI) has developed the *International Cyanide Management Code For the Manufacture, Transport, and Use of Cyanide In the Production of Gold* (The Code) under the aegis of the United Nations Environment Programme. It is a voluntary fee-based certification program for companies in the gold and silver mining industry. The Code is an internationally recognized certification program which details the benchmark for best management practices for cyanide manufacturing, transportation and use in gold and silver mining. To become a signatory, a company must submit a 'Signatory application form' and pay associated annual signatory fees. By becoming signatories, a company commits to following The Code's principles and are required to implement its standards of practice. Companies must bring their operations into compliance with The Code within three years. Audits are undertaken by third-party auditors to verify the company's compliance.

Many of the requirements of The Code will also be required under the various items of legislation, licences, permits and approvals that will apply to the site.

Australian Dangerous Goods Code (ADG Code)

The ADG Code sets out the requirements for transporting dangerous goods by road or rail and applies across Australia. It has legal effect through the operation of individual State legislation, which in the case of Western Australia is the DGS Act.

1. Production and Purchasing

1.1. Production and purchasing

Mining Standard of Practice 1.1 Purchase cyanide from certified manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide and to prevent releases of cyanide to the environment.

RTW will demonstrate compliance with this requirement by ensuring that its cyanide supplier(s) is compliant with the Code.

Commitments and Actions

1. Cyanide will be sourced from a supplier that is certified under the Code.
2. Cyanide supplier(s) will be required to have independent audits undertaken of Code compliance, and to submit the supplier(s) records of compliance status.

Records that will be maintained to demonstrate compliance with this element

- Cyanide supply contract
- Records of supplier compliance with the Code

2. Transportation

2.1. Safe transportation of cyanide

Mining Standard of Practice 2.1 Require that cyanide is safely managed through the entire transportation and delivery process from the production facility to the mine by use of certified transport with clear lines of responsibility for safety, security, release prevention, training and emergency response.

RTW will demonstrate compliance with this requirement by establishing a written agreement with its supplier as part of its supply contract. The written agreement will include the following elements in relation to safe cyanide transport, whether by the supplier itself or by a third party engaged by the supplier:

- Clearly defined responsibilities for all parties involved in the supply chain.
- Cyanide labelling.
- Cyanide storage (by supplier and transporter).
- Community engagement along the transport route to the Winu project.
- Documentation indicating training of transport staff is up to date in the safe handling, storage, first aid and emergency response procedures.
- Security of cyanide throughout the storage and transport processes.
- Transport route to Winu.

- Properties of the cyanide being stored, transported and unloaded (to the Winu uploading facility).
- Nature of cyanide transport vessel.
- Health hazards.
- Environmental hazards.
- Procedural forms for the cyanide safety management program from suppliers and transporters.

Commitments and Actions

3. A written agreement will be included within cyanide supply contract(s) that addresses the safe transport of cyanide, whether by the supplier or a third party engaged by the supplier.

Records that will be maintained to demonstrate compliance with this element

- Cyanide supply contract.
- Written agreement within its supply contract(s) that addresses safe transport of cyanide.
- Records of supplier compliance with the Code.

3. Handling and storage

3.1. Storage

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

Cyanide facilities will be designed and constructed in accordance with the cyanide producers' guidelines. Configuration will be compliant with all relevant engineering standards and regulatory obligations.

In addition to appropriate engineering design, the facilities will be operated in accordance with work instructions that have been developed to protect the safety of workers and the environment. These work instructions may be embedded in relevant facility management plans where appropriate (e.g., TSF Management Plan).

The scope of work instructions (Commitment and Action 11) is discussed in Section 6.1.

Commitments and Actions

4. Cyanide facilities will be constructed in compliance with all relevant Australian Standards, and with any relevant Dangerous Goods Site Licence and Works Approval conditions.
5. All cyanide facilities will be away from offices and workshops.
6. All cyanide facilities will be fenced and locked in a compound where access is security controlled.
7. Closed tanks located in the open air will be fitted with ventilation pipes at the top.
8. There will be a cyanide compound access procedure.
9. Leak detection and electronic overtopping controls will be installed on any tanks that are used for liquid cyanide storage, including liquors generated from dissolution of briquettes.

10. Cyanide handling (delivery, unloading, storage and mixing) work instructions will be maintained and implemented.
11. Spill response and containment work instructions will be maintained and implemented.

Records that will be maintained to demonstrate compliance with this element

- Commissioning report.
- Cyanide compound access procedures.
- Cyanide handling work instructions.
- Cyanide spill response and containment work instructions.

3.2. Handling

Mining 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.

The cyanide handling work instructions (Commitment or Action 10) and spill response and containment work instructions (Commitment or Action 11) will include measures for ensuring that the procedures are maintained, and that they remain relevant and appropriate.

Commitments and Actions

12. A preventative maintenance schedule for all cyanide facilities will be developed and implemented.
13. An inspection and audit schedule for all cyanide facilities will be developed and implemented.
14. Failure mode analyses will be undertaken for design and operation, and appropriate mitigation measures adopted.

Records that will be maintained to demonstrate compliance with this element

- Cyanide handling procedures.
- Cyanide spill response and containment procedures.
- Preventative maintenance schedule.
- Inspection and audit schedule.
- Failure mode analysis reports.

4. Operations

4.1. Protecting human health and the environment

Mining Standard of Practice 4.1 Implement management and operating systems designed to protect human health and the environment including contingency planning, inspection and preventive maintenance procedures.

Refer to Sections 3.1 and 3.2 for relevant commitments, actions and verification records. No new commitments, actions and/or verification records are relevant for this section.

4.2. Minimization of cyanide use

Mining Standard of Practice 4.2 Introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings.

Process feed characteristics can vary and influence the consumption of cyanide within the mill circuit and therefore the WAD cyanide concentrations of the tailings.

Commitments and Actions

15. Continuous monitoring of process feed characteristics, throughput rates, gold recovery and reagent consumption will be undertaken to optimise reagent use and minimise WAD CN concentrations in plant waste streams.
16. A WAD CN analyser that enables real time sampling and analysis of WAD CN within processing plant waste streams will be installed.

Records that will be maintained to demonstrate compliance with this element

- Cyanide handling procedures.
- Metallurgy monitoring data.
- WAD CN monitoring data, with daily reporting of WAD CN to the TSF.

4.3. Water management program

Mining Standard of Practice 4.3 - Implement a comprehensive water management program to protect against unintentional releases.

The water balance referred to in this section involves, but is not limited to, all major slurry and water flows between the processing plant, destruction circuit, TSF and pits.

Commitments and Actions

17. A water balance model will be developed for the site.
18. Water metering and/or monitoring will be implemented to verify the water balance in real time.

Records that will be maintained to demonstrate compliance with this element

- Water balance.
- Water balance metering and/or monitoring records.

4.4. Protecting fauna from adverse effects of cyanide process solutions

Standard of Practice 4.4 - Implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.

The Cyanide Code requires fauna access restriction measures to be installed if WAD-CN concentrations in fauna accessible areas exceeds 50 mg/L, or if there is evidence of CN-related fauna mortalities in practice.

The operational controls and spill management procedures that will be implemented to manage occupational health and safety risks, will also provide a level of protection to wildlife with the WAD-CN concentration in all fauna-accessible areas expected to remain below the 50 mg/L trigger. The following additional measures will be implemented, with further measures to be considered if evidence of CN-related fauna mortalities is observed

Commitments and Actions

19. Records of wildlife interactions with cyanide solutions will be maintained and reported as environmental incidents.
20. Wildlife inspections and incident investigations will be completed by trained staff, or by specialist ecologists in the event of significant incidents.

Records that will be maintained to demonstrate compliance with this element

- Incident register.
- Wildlife monitoring records.

4.5. Protecting fauna from discharges of cyanide process solutions into surface water

Mining Standard of Practice 4.5 Implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.

RTW will not be any discharging of cyanide processing solutions to surface waters.

4.6. Managing seepage from cyanide facilities

Mining Standard of Practice 4.6 Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of ground water.

There are no beneficial uses for groundwater at Winu, and leakage from the TSF and other cyanide facilities is expected to be contained due to the pit lake's drawdown cone. Notwithstanding that the consequences of seepage are expected to be limited, groundwater monitoring will be undertaken to confirm that the TSF is functioning as intended. A groundwater monitoring programme is also likely to be required as a condition of the Part V licence.

Commitments and Actions

21. A groundwater monitoring program will be established to identify seepage from the TSF and other cyanide facilities.

Records that will be maintained to demonstrate compliance with this element

- Groundwater monitoring records.

4.7. Spill prevention and containment measures

Mining Standard of Practice 4.7 Provide spill prevention or containment measures for process tanks and pipelines.

Refer to Sections 3.1 and 3.2 for relevant commitments, actions and verification records. No new commitments, actions and/or verification records are relevant for this section.

4.8. Quality control and assurance procedures

Mining 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.

Refer to Section 3.1 for relevant commitments, actions and verification records. No new commitments, actions and/or verification records are relevant for this section.

4.9. Monitoring programs

Mining Standard of Practice 4.9 - Implement monitoring programs to evaluate the effects of cyanide use on wildlife, and surface and groundwater quality.

Refer to Sections 3.2, 4.2, 4.3, 4.4 and 4.6 for relevant commitments, actions and verification records. No new commitments, actions and/or verification records are relevant for this section.

5. Decommissioning

5.1. Decommissioning procedures

Mining Standard of Practice 5.1 - Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife, livestock, and the environment.

The Mining Act requires a Mine Closure Plan and a TSF Design Report (which includes the proposed closure approach) to be submitted as part of the Mining Proposal. These plans will document how cyanide risks will be managed during operations to minimise risks at the time of closure, and how the residual risk at closure will be mitigated. They will also address how cyanide facilities will be decommissioned.

Aspects that will need to be covered include:

- Treatment, neutralization or management of process solutions containing CN that remain in storage and production facilities as the site approaches closure. Examples of such measures would include decontamination of equipment, removal of residual cyanide reagents and

management of surface waters so that they do not present a risk to people, wildlife, or the environment.

- Timetable of decommissioning activities.

Commitments and Actions

22. A Mine Closure Plan and a TSF Design Report will be developed. These documents will record how cyanide risks will be managed at closure, including how cyanide facilities will be decommissioned.

Records that will be maintained to demonstrate compliance with this element

- Mine Closure Plan.
- TSF Design Report.

5.2. Decommissioning funding

Mining Standard of Practice 5.2 - Establish a financial assurance mechanism capable of fully funding cyanide-related decommissioning activities.

Rio Tinto is a global organisation with centralised management of closure funding mechanisms, supported by annual updates of closure cost estimates for each asset and regular closure risk reviews.

Commitments and Actions

23. Annual closure cost estimates will be prepared for Winu and reported in accordance with the Rio Tinto Closure Standard.

Records that will be maintained to demonstrate compliance with this element

- Closure cost estimate.

6. Worker safety

6.1. Exposure prevention and safety measures

Mining Standard of Practice 6.1 Identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them.

The procedures and work instructions identified in Section 3.1 are also relevant to this section. They will include, but not be limited to:

- Inductions – general, specific and refresher training and assessments.
 - Standards, Guidelines and Procedures – overarching guidance documents accompanied by detailed work instructions, including: Cyanide control including cyanide storage compound access.

- Cyanide spill ground decontamination.
- Cyanide equipment flushing.
- Management and operation of HCN monitors.
- Personal Protective Equipment Procedure (including respiratory protection)
- Medical protocol for cyanide poisoning
- Emergency Response Plan
- Tailings storage facility inspections.
- Risk Management Procedures, including field-based risk assessments such as Job Hazard Analysis (JHA) and Take 5s to be undertaken prior to commencement of tasks to identify and control any risks not previously identified.
- Change Management Procedure – Winu will have a Management of Change procedure that will be used for significant changes to infrastructure, management, or personnel. This will incorporate safety analysis and training for staff.

6.2. Evaluation of safety measures

Mining 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.

Refer to Section 3.1 and 3.2 for relevant commitments, actions and verification records. Additional commitments, actions and/or verification records are presented below.

Commitments and Actions

24. All personnel will be properly inducted, with inductions to include information about occupational health and safety risk mitigation.
25. All personnel working in cyanide facilities will wear personal HCN gas monitors.
26. Static monitors will be installed in all cyanide facilities.
27. Appropriate safety equipment such as safety showers, low pressure eye wash stations and fire extinguishers will be installed in cyanide facilities.

Records that will be maintained to demonstrate compliance with this element

- Induction records.
- Personal exposure monitoring records.
- Commissioning report.
- Safety equipment maintenance records.

6.3. Development of emergency response plans and procedures

Mining Standard of Practice 6.3 Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

The emergency response plans referred to in this section will include:

- Cyanide HAZMAT information.
- Documentation of personnel safety controls that have been installed including:
 - Audible emergency alarm system.
 - Locations of medical equipment such as oxygen, antidote hydroxocobalamin kits (Cyanokits), advanced airway management kits and defibrillators.
 - Locations of eye wash stations, safety showers and fire extinguishers.
- Procedures for obtaining on-site medical attention.
- Communication procedures with stakeholders and medical services including the Royal Flying Doctor Service.
- Allocation of personnel to emergency response positions (e.g., on-scene commander, response team captain, environmental officer).
- Roles and responsibilities of external responders such as Royal Flying Doctor Service.
- Spill recovery procedures.
- Post-incident health and/or environmental monitoring.
- Response plan review process.
- Emergency drills and associated debrief sessions.

Commitments and Actions

28. Emergency response plan

Records that will be maintained to demonstrate compliance with this element

- Emergency response plan.

7. Emergency Response

7.1. Emergency response plans

Mining Standard of Practice 7.1 Prepare detailed emergency response plans for potential cyanide releases.

Refer to Section 6.3 for relevant commitments, actions and verification records. No new commitments, actions and/or verification records are relevant for this section.

7.2. Personnel and stakeholder involvement in planning processes

Mining Standard of Practice 7.2 Involve site personnel and stakeholders in the planning process.

Commitments and Actions

29. Site personnel will be provided the opportunity to participate in risk mitigation through involvement in safety meetings, risk assessments and emergency drill debriefing sessions.

Records that will be maintained to demonstrate compliance with this element

- Meeting records.

7.3. Designation of personnel and provision of emergency equipment and resources

Mining Standard of Practice 7.3 Designate appropriate personnel and commit necessary equipment and resources for emergency response.

Refer to Section 6.3 for relevant commitments, actions and verification records. No new commitments, actions and/or verification records are relevant for this section.

7.4. Internal and external emergency notification and reporting

Mining Standard of Practice 7.4 Develop procedures for internal and external emergency notification and reporting.

Refer to Section 6.3 for relevant commitments, actions and verification records. No new commitments, actions and/or verification records are relevant for this section.

7.5. Remediation measures and monitoring

Mining Standard of Practice 7.5 Incorporate remediation measures and monitoring elements into response plans and account for the additional hazards of using cyanide treatment chemicals.

Refer to Section 6.3 for relevant commitments, actions and verification records. No new commitments, actions and/or verification records are relevant for this section.

7.6. Evaluation of response procedures

Mining Standard of Practice 7.6 Periodically evaluate response procedures and capabilities and revise them as needed.

Refer to Section 6.3 for relevant commitments, actions and verification records. No new commitments, actions and/or verification records are relevant for this section.

8. Training

8.1. Cyanide hazard training

Mining Standard of Practice 8.1 Train workers to understand the hazards associated with cyanide use.

Refer to Section 6.2 for relevant commitments, actions and verification records. No new commitments, actions and/or verification records are relevant for this section.

8.2. Safe operation of facilities

Mining 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.

The training addressed in this section is in addition to the inductions referenced in Section 6-2.

Commitments and Actions

30. Competency based training will be delivered to all personnel working in cyanide facilities, covering relevant cyanide management systems and procedures, including emergency response procedures.

Records that will be maintained to demonstrate compliance with this element

- Training records.

8.3. Responses to worker exposure

Mining Standard of Practice 8.3 Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide

Refer to Section 6.3 & 8.2 for relevant commitments, actions and verification records. No new commitments, actions and/or verification records are relevant for this section.

9. Dialogue and Disclosure

9.1. Cyanide management and responsibilities

Mining Standard of Practice 9.1 Promote dialogue with stakeholders regarding cyanide management and responsibly address identified concerns.

Commitments and Actions

31. Engagement regarding the mitigation of cyanide risks will be undertaken with Traditional Owners through established engagement forums, with any raised concerns recorded and responded to.

Records that will be maintained to demonstrate compliance with this element

- Engagement records.

9.2. Accessibility of information

Mining Standard of Practice 9.2 Make appropriate operational and environmental information regarding cyanide available to stakeholders.

Refer to Section 9.1 for relevant commitments, actions and verification records. No new commitments, actions and/or verification records are relevant for this section.

Appendix A

Ref	Code Sections	Commitment or Action	Verification Records
1	1-1 2-1	Cyanide will be sourced from a supplier that is certified under the Code.	Cyanide supply contract
2	1-1 2-1	Cyanide supplier(s) will be required to have independent audits undertaken of Code compliance, and to submit the supplier (s) records of compliance status.	Records of supplier compliance with the Code
3	2-1	A written agreement will be included within cyanide supply contract(s) that addresses the safe transport of cyanide, whether by the supplier itself or by a third party engaged by the supplier.	Written agreement within its supply contract(s) that addresses safe transport of cyanide
4	3-1 4-7 4-8	Cyanide unloading and storage facilities will be constructed in compliance with all relevant Australian Standards, and with any relevant Dangerous Goods Site Licence and Works Approval conditions.	Commissioning report
5	3-1	All cyanide facilities will be away from offices and workshops.	Commissioning report
6	3-1	All cyanide facilities will be fenced and locked in a compound where access is security controlled.	Commissioning report
7	3-1 4-8	Closed tanks located in the open air will be fitted with ventilation pipes at the top.	Commissioning report
8	3-1 6-2	There will be a cyanide compound access procedure.	Cyanide compound access procedure
9	3-1 4-7 4-8 6-2	Leak detection and electronic overtopping controls will be installed on any tanks that are used for liquid cyanide storage, including liquors generated from dissolution of briquettes.	Commissioning report

Ref	Code Sections	Commitment or Action	Verification Records
10	3-1 3-2 4-1 4-2 4-7 6-1 6-2	Cyanide handling (delivery, unloading, storage and mixing) procedures will be maintained and implemented.	Cyanide handling work instructions
11	3-1 3-2 4-1 4-7 6-1 6-2	Spill response and containment work instructions will be maintained and implemented.	Cyanide spill response and containment work instructions
12	3-2 4-1 4-7 6-2	A preventative maintenance schedule for all cyanide facilities will be developed and implemented.	Preventative maintenance schedule
13	3-2 4-1 4-7 4-9 6-2	An inspection and audit schedule for all cyanide facilities will be developed and implemented.	Inspection and audit schedule
14	3-2 6-2	Failure mode analyses will be undertaken for design and operation, and appropriate mitigation measures adopted.	Failure mode analysis reports.

Ref	Code Sections	Commitment or Action	Verification Records
15	4-2 6-2	Continuous monitoring of proceed feed characteristics, throughput rates, gold recovery and reagent consumption will be undertaken to optimise reagent use and minimise WAD CN concentrations in plant waste streams.	Metallurgy monitoring data
16	4-2 4-9 6-2	A WAD CN analyser that enables real time sampling and analysis of WAD CN within processing plant streams will be installed.	WAD CN monitoring data, with daily reporting of WAD CN to the TSF
17	4-3	A water balance model will be developed for the site.	Water balance
18	4-3 4-9	Water metering and/or monitoring will be implemented to verify the water balance in real time.	Continuous water balance metering and/or monitoring records
19	4-4	Records of wildlife interactions with cyanide solutions will be maintained and reported as environmental incidents.	Incident register
20	4-4 4-9	Wildlife inspections and incident investigations will be completed by trained staff, or by specialist ecologists in the event of significant incidents.	Wildlife monitoring records, incident register
21	4-6 4-9	A groundwater monitoring program will be established to identify seepage from the TSF and other cyanide facilities.	Groundwater monitoring records
22	5-1	A Mine Closure Plan and TSF Design Report will be developed and will document how cyanide risks will be managed at closure, including how cyanide facilities will be decommissioned.	Mine Closure Plan, TSF Design Report
23	5-2	Annual closure cost estimates will be prepared for Winu and reported in accordance with the Rio Tinto Closure Standard.	Closure cost estimate
24	6-2 8-1	All personnel will be properly inducted, with inductions to include information about occupational health and safety risk mitigation.	Induction records
25	6-2	All personnel working in cyanide facilities will wear personal HCN gas monitors.	Personal exposure monitoring records
26	6-2	Static monitors will be installed in all cyanide facilities.	Commissioning report

Ref	Code Sections	Commitment or Action	Verification Records
27	6-2	Appropriate safety equipment such as safety showers, low pressure eye wash stations and fire extinguishers will be installed in cyanide facilities.	Safety equipment maintenance records
28	6-3 7-1 7-3 7-4 7-5 7-6	Emergency response plan	Emergency response plan.
29	7-2	Site personnel will be provided the opportunity to participate in risk mitigation through involvement safety meetings, risk assessments and emergency drill debriefing sessions.	Safety meeting records.
30	8-2 8-3	Competency based training will be delivered to all personnel working in cyanide facilities, covering relevant cyanide management systems and procedures, including emergency response procedures.	Training records.
31	9-1 9-2	Engagement regarding the mitigation of cyanide risks will be undertaken with Traditional Owners through established engagement forums, with any raised concerns recorded and responded to.	Engagement records

