

# CMSI Consultation Response

## Respondent Details

NAME

Eric Schwamberger

COUNTRY

United States

PERMISSION

Yes, CMSI can disclose my feedback, name, and organisation.

STAKEHOLDER

Other Standard Setting Body: International Cyanide Management Institute

ORGANISATION

International Cyanide Management Institute

## COMMENTS & QUESTIONS BY DOCUMENT

Document:  
Governance

### QUESTION 1

**The governance principles that guided the development of the governance model are inclusive, effective, credible, impact-driven, pragmatic and efficient. From your perspective, does the proposed governance model meet expectations for consistency with these principles?**

Response: No Response

### QUESTION 2

**Does the proposed governance model ensure no single group is able to unduly influence decisions?**

Response: unsure

Document:  
Assurance

### QUESTION 1

**From your perspective, does the Assurance process meet your expectations of a robust, credible, replicable and transparent approach?**

Response: No Response

Document:  
Standard

## Performance Area 22: Pollution Prevention

SECTION: 22.5 Cyanide

COMMENT:

*Comments of the International Cyanide Management Institute on Section 22.5 of the Proposed Consolidated Mining Standard*

*Below please find the comments of the International Cyanide Management Institute (the "ICMI") on the Proposed Consolidated Mining Standard (the "Standard"), and specifically on Section 22.5, which address the use of cyanide in the production of metals. These comments will provide you and stakeholders with context and additional information on the International Cyanide Management Code (the "Cyanide Code"), and our recommendations for the Standard's coverage on the management of cyanide.*

*We commend The Copper Mark, the Mining Association of Canada, the World Gold Council and the International Council on Mining and Metals for this undertaking and believe it can play an important role in improving industry performance.*

#### *About the Cyanide Code*

*ICMI appreciates this opportunity to comment on the proposed Standard. Our organization is the nonprofit organization that administers the Cyanide Code. The Cyanide Code is a risk-based assurance system focused on the safe and environmentally responsible management of cyanide by companies producing gold and/or silver and by companies manufacturing, warehousing, and transporting cyanide. Based on Principles and Standards of Practice, the Cyanide Code provides a management system for the safe management of cyanide throughout its use cycle. The Cyanide Code program also provides detailed guidance on implementing practices to meet its objectives as described in its Standards of Practice. These objectives include protection of workers, communities and the environment from exposure to harmful concentrations of cyanide, limiting releases of cyanide to the environment, and enhancing response actions in the event of exposure or release.*

*The mining industry's stakeholders have high expectations that cyanide will be safely managed. We believe that the Cyanide Code meets those expectations through its rigorous standards and requirements for having systems and procedures in place for things such as spill prevention, wildlife protection, environmental monitoring, worker training, and emergency response capabilities. Stakeholder expectations are also met through a rigorous and independent auditing and certification process that relies on professionals that meet strict requirements for technical expertise and experience.*

*The Cyanide Code is also highly transparent. Audit reports and the auditors' credentials are available online for public inspection. Public access to Cyanide Code audit reports means that stakeholders can access and assess the operational systems and practices in place for safe cyanide management. This transparency sets the Cyanide Code apart from most other global management systems or certification systems in the minerals sector.*

*The Cyanide Code has been broadly adopted, and today 57 mining companies from around the globe rely on the Cyanide Code at 140 mining operations. It has been successfully adopted at mining operations in widely diverse conditions and climates. These mining operations are both large and small, employing different techniques for using and managing cyanide in processing ore.*

#### *ICMI Comments on Section 22.5*

##### *Foundational Practice*

*While we understand that some mining operations may initially not be in a position to meet all of the requirements of the Cyanide Code, we do believe that nearly all can meet the Code's requirements for purchasing cyanide from Cyanide Code certified suppliers, and for that cyanide to be transported from the certified manufacturing facilities to the mine site by Code-certified transport or Code-certified supply chains. Therefore, ICMI recommends that the Standard's Foundational Practice state "Where the Facility uses cyanide, it should use cyanide from manufacturers and distributors certified under the Cyanide Code as identified on the International Cyanide Management Institute website, and have its cyanide transported by certified transport operators and transportation supply chains."*

##### *Good Practice*

*For a mining facility to achieve and maintain certification to the International Cyanide Management Code, it must also purchase its cyanide from a supplier that is presently certified within the International Cyanide Management Institute's assurance system, and that the cyanide is transported by similarly certified transport operators or supply chains. Consequently, part two of the Good Practice section dealing with transport, storage, and disposal of cyanide is superfluous and we recommend that it be stricken.*

*Clarification on Certification Framework*

*Certification under the Cyanide Code is a key metric in achieving Good Practice by mining operations. It is also a key metric that must be achieved by transporters and producers used by mines in order to achieve Foundational Practice. To ensure clarity on the meaning of "certification", we recommend that the Standard clearly articulates that certification must be made within ICMI's transparent assurance framework. Therefore, for Good Practice, we suggest language such as "To achieve Good Practice, mining operations using cyanide must be certified under the Cyanide Code and identified as certified on the International Cyanide Management Institute website (www.cyanidecode.org). For Foundational Practice, we suggest language such as "To achieve Foundational Practice transporters and suppliers of cyanide for mining operations must be certified under the Cyanide Code and identified as certified on the International Cyanide Management Institute website (www.cyanidecode.org).*

*Thank you for your consideration of the above comments.*

*Kind regards,*

*Eric C. Schwamberger, Ph.D.*

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QUESTION 1

**Does the scope, content, and narrative style of the consolidated standard meet your individual expectations and the collective industry expectation for responsible production practices?**

Response: No Response

QUESTION 2

**Do the requirements meet your expectations for being sufficiently clear to support consistent and practical implementation and to achieve necessary performance improvement?**

Response: No Response

QUESTION 3

**From your perspective, does the three-level performance structure (Foundational, Good, Leading) of the Consolidated Standard meet your expectations for providing an effective on ramp and clear articulation of good practice and effective path to continuous improvement?**

Response: No Response

Document:  
Claims

QUESTION 1

**We would value perspectives on a few additional questions related to threshold of performance associated with achievement claims. Please click here/ see page 11 of Reporting and Claims Policy.**

Response: No Response