

APPENDIX 33-C
INTERNATIONAL CYANIDE MANAGEMENT CODE
PRINCIPLES AND STANDARDS OF PRACTICE

Appendix 33-C. International Cyanide Management Code Principles and Standards of Practice

Seabridge has opted to follow the Principles and Standards of Practice of the Cyanide Code (ICMI 2012) copied below:

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.

2. TRANSPORTATION *Protect communities and the environment during cyanide transport.*

Standards 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.

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

3. HANDLING AND STORAGE *Protect workers and the environment during cyanide handling and storage.*

Standards 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.

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.

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

Standards of Practice

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

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

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

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

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

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

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

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

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

5. **DECOMMISSIONING** *Protect communities and the environment from cyanide through development and implementation of decommissioning plans for cyanide facilities.*

Standards of Practice

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

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

6. **WORKER SAFETY** *Protect workers' health and safety from exposure to cyanide.*

Standards of Practice

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

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

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

7. EMERGENCY RESPONSE *Protect communities and the environment through the development of emergency response strategies and capabilities.*

Standards of Practice

7.1 Prepare detailed emergency response plans for potential cyanide releases.

7.2 Involve site personnel and stakeholders in the planning process.

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

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

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

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

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

Standards of Practice

8.1 Train workers to understand the hazards associated with cyanide use.

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

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

9. DIALOGUE *Engage in public consultation and disclosure.*

Standards of Practice

9.1 Provide stakeholders the opportunity to communicate issues of concern.

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

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

REFERENCE

ICMI. 2012. The International Cyanide Management Code for the Manufacture, Transport and Use of Cyanide in the Production of Gold (Cyanide Code). Cyanide use: http://www.cyanidecode.org/cyanide_use.php; Environmental and health effects: http://www.cyanidecode.org/cyanide_environmental.php; Principles and standards of practice: http://www.cyanidecode.org/about_code.php (accessed April 2012).