



January 3, 2023

## Cyanide Transportation and Handling Letter

Linda Jackson  
Payette Forest Supervisor  
500 N Mission St, Building 2  
McCall, ID, 83638

Dear Linda Jackson,

I am writing in support of Perpetua's Stibnite Gold Project as a representative of Cyanco. Cyanco is the world leading distributor of sodium cyanide and has extensive experience ensuring safe transport and delivery of cyanide to mining and industry customers across North and South America. Because of the potential adverse impacts on human health and the environment from accidental release of cyanide, during the preparation of the Stibnite Gold Project Plan of Restoration and Operations (PRO; Midas Gold 2016), Perpetua (formerly Midas Gold) consulted with Cyanco to develop Principles and Standards of Practice for cyanide transport and handling at the SGP which would be compliant with the International Cyanide Management Code (ICMC). The ICMC is a voluntary certification program that provides guidelines pertaining to the manufacture, transportation, storage, and use of cyanide for gold and silver extraction in the mining industry. The ICMC was one of the earliest standards and certification programs developed for the minerals sector, and today it is amongst the most established certification programs in the mining industry. It has been successfully adopted around the world at mining operations in widely diverse conditions and climates, in developing and developed countries. A review of ICMC-compliant operators at major gold producers in Nevada, Colorado and across North America (<https://cyanidecode.org/worldwide-participants>) indicates the prevalence of ICMC's influence among precious metal operations. Cyanco provides cyanide products to many of these operators, and Perpetua has specified that Cyanco is likely to be the primary cyanide producer for the Stibnite Gold Project. Safety procedures governing cyanide procurement, transport and handling will ensure that operations involving cyanide can be conducted safely and without accidental release. Consistent with the ICMC, cyanide will be procured from Cyanco or other manufacturers with appropriate occupational health and safety protocols in place. Transport and handling operations will be conducted following safety, security, release prevention and quality assurance guidelines consistent with the International Cyanide Management Code. Cyanco and its transporters of cyanide are certified in compliance the ICMC. For mines to be compliant they must purchase cyanide from certified producers and have the cyanide transported by certified transporters.

As summarized in Section 4.7.2.2 of the SDEIS, Perpetua will employ specific management practices to reduce risk of accidental release of cyanide. Cyanide will be transported in solid form as briquettes which reduces the risk of leaks during transport. The briquettes will be transported in DOT approved heavy-duty stainless-steel ISO containers which are designed to withstand rollover accidents, should transport vehicle accidents occur. Transport trucks will be escorted by pilot vehicles to reduce likelihood of accidents. The briquettes will be dissolved within the containers at the process plant mixing facility, further reducing any risk of spills associated with loading or unloading of materials. The mixing facility will have appropriate spill containment design elements as an additional safety measure. Once dissolved at the process plant, the empty re-usable containers will be returned to the manufacturer, eliminating the need for storage or disposal of packaging materials. These measures collectively provide significant protections to ensure that



cyanide can be transported and used for ore processing safely and without impacts to human health or the environment.

In addition to cyanide handling and management, the tailings cyanide neutralization process utilizing sodium metabisulfite and an oxidant is an industry standard method utilized globally by cyanidation facilities. This proven process is highly effective in reducing WAD cyanide concentrations to protect wildlife that may come in contact with process or tailings consolidation waters.

The SDEIS appropriately concludes that the monitoring plans, design measures and engineering controls summarized in the SDEIS and outlined in the supporting Hazardous Materials Management Plan would minimize the risk of accidental releases of cyanide and other hazardous materials. The overarching effects analysis of spill risk that “potential releases of hazardous materials under the 2021 MMP would be localized, temporary and minor to major,” depending on the release and specific material (p. 4-140), overstates the risk specifically associated with cyanide due to the significant protective measures and controls utilized by Cyanco and other viable contractors, especially transport of solid briquettes in enclosed ISO containers. While acknowledging that the specific risk from cyanide transport and handling is minor would improve the SDEIS overall, the conclusion that the Johnson Creek Route Alternative carries greater risk owing to higher spill risk and higher potential consequences due to the proximity to surface water resources is valid and appropriately supports the forest’s selection of the MMP alternative. Perpetua’s adoption of the voluntary guidance under the ICMC attests to the company’s corporate sustainability focus, a philosophy which will ultimately result in successful restoration of the Stibnite Site if the project is approved. I urge the forest service to issue a positive record of decision approving the Stibnite Gold Project under the 2021 modified mine plan alternative.

Sincerely,

Steve Cochrane  
USA Sales Manager  
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