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Title:

Comments: I write regarding the Stibnite Gold Project (EIS #50516) and wish to provide comment on aspects of the Project .

By way of background, I am a social anthropologist (see below for key qualifications) and have more than forty years of working with local communities in more than 15 countries. My specialty is engaging with communities, understanding their perspectives, values, and ways of life, particularly where they are impacted by economic developments such as mining. I have undertaken work on behalf of communities, with civil society and with governments. Additionally, I have worked in both operational/site and executive roles for major mining companies across the globe . Hence, I believe I have a unique perspective of understanding how mutually beneficial relationships can come about with major extractive projects.

I currently own and operate Yirri Global LLC, a consulting business based in Denver Colorado (WWW.Yirri.Global ). In late 2019, we were commissioned by Midas Gold Corp., at the request of Board members, to undertake a study of aspects of its Idaho subsidiary (Midas Gold Idaho, Inc.) and the Stibnite Gold Project in Central West Idaho. The objective of the study was to ascertain the nature and success or otherwise of the social performance, and particularly the stakeholder outreach and engagement, of Midas Gold Idaho and the Stibnite Project. The study included a site and region visit during December 2019 in which local people of diverse backgrounds and roles - community leaders, residents, government officials, company personnel and others - were interviewed. These were intensive and lengthy and mostly face to face interviews lasting one to two hours (three were done via telephone.) During this process, in total, I interviewed 30 people, of which 23 were from the project region, while seven were from the Boise area. Suggestions were made by the company as to possible interviewees, but the end choice was mine and I made sure to include a range of people (including those in favor of the project, those opposing and those indifferent).

A large number of diverse documents was also reviewed, and internet research undertaken on the company, its project and how it has dealt with its social context, including materials posted by those opposed to the project.

Although engaged by and paid by Midas Gold for this study, my brief was to provide an objective, external examination of a sample of community views on how the company has engaged with them and a description and analysis of the indicators of their support or otherwise. As a professional anthropologist it is my duty to 'call it as I see it ' and to produce independent description and analyses of community perspectives.

I should add, too, that it was not my job to discuss the merits, or otherwise, of the project with community members: I wanted to know their views on the company's engagement with them and the community members' views on the company and its actions and activities.

My study found that:

[bull] The company has a strong focus on its local stakeholders and everything they do is aimed at providing information, listening and building trust.

[bull] Transparency around everything they do and giving access to community members to relevant information in a variety of ways is a hallmark of the company. This aspect sets the project apart from most other mining companies we have seen. Interviewees were particularly grateful for this.

[bull] The project team is made up of either locals - natives or long-standing residents- or Boise[shy] based

Idahoans.

[bull] The establishment by the parent company of Midas Gold Idaho as the project's implementing entity is seen by stakeholders as reflecting an important commitment to the state and the region.

[bull] The company is seen by locals has part of the fabric of the community. Over the last ten years they have supported many community development projects, thus far spending \$780,000, long before seeing any financial return from the mine.

[bull] A focus of the project is on the eight local communities in the region of what will be the greatest impact and influence of the project and this is deeply appreciated by the residents.

[bull] This outreach - though it is labor intensive and time-consuming- is, in our view, the most effective means of engagement by Midas. Its utilization, even with project-opposing individuals, is important to continue and perhaps even to be intensified.

[bull] Significant public commitment to, and implementation of, transparency around all activities and issues has been made and delivered upon.

[bull] Industry-leading practices include: establishment of community advisory groups, development and use of formal community agreements, and a foundation based on transparent and democratic principles of funding and independent decision-making for social investment and community development.

[bull] The company has a broad-brushed strategy on communication combined with intense use of social media and multiple face-to-face meetings and individual outreach via telephone and email. The implementation of this strategy has been excellent and effective.

[bull] Evidence for these views is provided in the records of our interviews and we can make this available to the Service if requested (with permission of Midas Gold and the interviewees).

Midas Gold Idaho and the Stibnite Gold Project Communities and Communications team and the senior management of the company are doing an excellent job in a challenging environment . We would go so far as to say that we have not seen such skilled, dedicated professionals operating and utilizing industry-leading practices and initiatives in our decades of work in mining and communities world-wide .

Our findings from the original survey last year and subsequent research indicate that the majority of local residents support the project. They have trust in the company to do the right thing and to meet all its commitments, both legal/regulatory and more generally to the communities. Quite frankly, they see the Stibnite site as it is today with the extensive environmental damage from legacy mining, as an ecological mess. They believe that only mining with the most modern and innovative technologies and planning will clean it up. No one else will do it, they say! They are overwhelmingly confident in Midas Gold and the Stibnite project as it is planned.

Community members are, of course, looking forward to the employment prospects and the other direct and indirect positive economic impacts. The view of local sportspeople (fishing, kayaking, hunting, hiking, ATVs) is that the go-ahead for the mine will enhance their activities and not threaten them.

There are, of course, those individuals and organizations, who are against the project. My interviews with them often revealed that they were against mining any time and anywhere . One pragmatic environmentalist maintained, however, that he and his organization did not like mining but that if it had to occur, they would prefer that Midas Gold do it.