

SEABRIDGE GOLD

April 27, 2020

Christopher Sergeant
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Julian D. Olden
Professor of Aquatic and Fishery Sciences, University of Washington

Via Email:
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Dear Mr. Sergeant and Mr. Olden,

In a recent opinion article, you authored, “Mine waste dams threaten the environment, even when they don’t fail,” you insinuate regulators do not, or did not, take a measured and cautious view of planning the tailing management facilities at Seabridge Gold’s KSM project. You also erroneously suggested there was no independent science that went into assessing the risk of mine storage—all which is contrary to the facts and evidence.

As research scientists, I am confident you will be interested in learning about the facts and evidence-based-decisions that went into designing, approving and the long-term management planning for the KSM Projects’ tailings management facilities.

Over the course of seven years, between 2008 and 2014, 250 independent scientists from across 20 disciplines along with a cadre of geophysical, geotechnical mining, design and civil engineers, social scientists, Indigenous traditional scientists, and government regulators collected and reviewed 35,000 pages of research conducted by Seabridge Gold. Also, this information was further reviewed independently by Tahltan Nation and Nisga’a Lisims scientists and the Alaska and US Federal regulators concerning the environmental, economic, social, heritage, cumulative and health effects of the proposed project. Finally, Seabridge Gold gathered 15,000 comments and questions from participants through consultation and engagement with local community members who, at the end of the seven-year-period, 76% fully supported the project’s environmental assessment application.

To suggest that the KSM independent joint-harmonized review under the British Columbia Government Environmental Assessment Act and the Canadian Environmental Assessment Act, both considered among the most rigorous regulatory acts in the world was not rigorous is unprincipled and illustrates a lack of comprehension about the independent scientific review and the regulatory process required for permitting mine projects in Canada.

It is also important to note, the Canadian Minister of the Environment, in her decision statement approving the KSM Project, stated: *“The project is not likely to cause adverse environmental effects as defined in the former Act, taking into account the implementation of mitigation measures*

described in the report ... the mitigation measures and follow up programs described in the Report are appropriate for the project.”

Further, the British Columbia Ministers of Environment and Energy and Mines concluded, *“the project will be constructed, operated and decommissioned in a way that ensures that no significant adverse effects are likely to occur.”*

Also, Seabridge Gold initiated a Best Available Tailings Technology Review of the planned management approach for the KSM Project. This study, which is readily available on our corporate website, reviewed and re-evaluated all prior decisions made concerning the tailings management facility, including a review of the proposed TMF location. This study confirmed that the existing tailing management facility design is the best available technology for tailings deposition and the most environmentally responsible plan to minimize long term risks associated with the proposed tailing storage facility for the KSM Project.

As a further step in the KSM review process of the proposed tailing management approach, well after receipt of the Environmental Assessment approvals, Seabridge commissioned an independent review of the BAT report by Dr. Dirk van Zyl, a world-recognized expert in tailings, mined-earth structures and sustainability with more than 40 years of experience. He also sat on the Mount Polley Independent Expert Review Panel. In his review, Dr. van Zyl concluded: *“I support the overall conclusions of the KSM BAT report.”*

As a scientist myself, given the 40,000 pages of research compiled by over 250 scientists, the seven-year regulatory review, three independent science reviews and 15,000 conversations that are all publically available, I am genuinely disappointed by the false information and insinuations you perpetrate in this article. Your lack of professional rigour in suggesting regulators did not take a measured and cautious view of planning the KSM tailings management facility and that no independent science went into assessing the risk is unconscionable. My professional science training taught me that good science happens through fact-based discussion and evidence-based decision making. I hope when including the KSM Project in the future articles, you will live up to our professional standards.

If you require any additional information, please do not hesitate to contact me.

Regards,



R Brent Murphy, M.Sc., P.Geol.,
Senior Vice President, Environmental Affairs
RBM/RS/...

Cc: Kyle Moselle, Associate Director Alaska Department of Natural Resources.