

SEABRIDGE GOLD

May 4, 2020

Sudip S. Parikh, Chief Executive Officer and Executive Publisher, *Science* Family of Journals
Email: sparikh@aaas.org

H. Holden Thorp, Editor-in-Chief
Science Journals
Email: hthorp@aaas.org

Re: Canada's Mines Pose Transboundary Risk; *Science*, April 24, 2020

Dear Mr. Parikh and Thorp,

I am writing to express my surprise that such a prestigious science publication would publish this ([Canada's Mines Pose Transboundary Risk Science, April 24, 2020](#)) unsubstantiated opinion letter erroneously suggesting the Canadian "Mine assessment and permitting do not require incorporation of independent and peer-reviews science," which is contrary to the facts and evidence. To print this letter suggesting that the KSM Project's independent joint-harmonized review conducted under the British Columbia Government Environmental Assessment Act, the Canadian Environmental Assessment Act and the Nisga'a Lisims Treaty, illustrates either a bias toward the natural resource sector or a lack of comprehension about the independent scientific review and the regulatory process for permitting mine projects in Canada.

As the publisher and editor of a professional science publication, I am confident you will be interested in learning the facts about the science, peer, international reviews and public consultations conducted before and during independent environmental assessment review of Seabridge Gold's KSM project. 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 and Indigenous traditional scientists worked together to research and publish 36,000 pages of scientifically rigorous information as it relates to the environment, economic, social, heritage, cumulative, International and health impacts of this project. This review included information related to potential transboundary concerns. This information was then independently reviewed by both the Tahltan First Nation and Nisga'a Lisims' scientists, who considered both the traditional scientific knowledge and traditional values as it related to the project.

It's important to note, not unlike research scientists, each of the scientist working on this project belong and are are licenced with professional regulatory bodies which regulate their practice through expected standards of practice and conduct.

Once the 36,000 pages of information were collected and collated, The Canadian Environmental Assessment Agency, The British Columbia Environmental Assessment Agency along with twenty US Federal and Alaska regulatory agencies and the Nisga'a Lisims' Government conducted extensive, independent reviews of the information. During this time, Seabridge Gold scientists conducted 115 meetings with the independent regulators to answer questions about their peer review of the science.

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Concurrently, and as a prerequisite to permitting projects in Canada, Seabridge Gold was required to gain a social license to operate from the local communities and First Nation rights holders.

After a decade of consultation and engagement with the local community members and First Nations rights holders, responding to 15,000 questions and comments, 76 percent of the local community members strongly supported the KSM project environmental assessment application. Additionally, both the Tahltan Nation and the Nisga'a Lisims Treaty Nation, (the First Nations on whose traditional territory the KSM Project is located) both signed economic benefit agreements in support of the KSM Project.

It is also important to note for the record, that after one of the most comprehensive environmental assessment ever undertaken in Canada and British Columbia, 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." The US and Alaska regulators were "satisfied there would be no down stream or transboundary impacts."

In a democracy, we are certainly welcomed a debate that was strengthened with the involvement of Alaskans, but there are legal and regulatory processes that we followed during the environmental assessment of the KSM project, given that both the US and Canada are countries founded on the "rule of law". Upon approval of the project, it will be up to the operator of the project who will be required by law to live up to the mitigation measures prescribed to ensure this project is developed and operated safely and does not have adverse effects on the environment.

As a scientist, given the 36,000 pages of research compiled by over 250 independent scientists, the seven-year independent regulatory review, three independent science reviews, over 15,000 conversations and our two First Nation partners' approval for the project, I am genuinely disappointed by the false information perpetrated by publishing this unsubstantiated opinion piece masquerading as a letter. My professional science training taught me that good science happens through fact-and evidence-based decision making. I hope in the future we can all expect that the Science Family of Journals will also live up to these scientific professional standards.

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

Regards,



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Senior Vice President, Environmental Affairs
Seabridge Gold