

SEABRIDGE GOLD

May 6, 2021,

Representative Geren Tarr
State Capitol Room 128
Juneau AK, 99801

Representative Louise Stutes
State Capitol Room 208
Juneau AK, 99801

Representative Andi Story
State Capitol Room 403
Juneau AK, 99801

Representative Jonathan Kreiss-Tomkins
State Capitol Room 411
Juneau AK, 99801

Representative Kevin McCabe
State Capitol Room 430
Juneau AK, 99801

Representative Dan Ortiz
State Capitol Room 513
Juneau AK, 99801

Representative Sarah Vance
State Capitol Room 424
Juneau AK, 99801

Dear Members of House Fisheries Special Committee:

Re: April 28, House Fisheries Special Committee Hearing

With respect to the recent House Fisheries Special Committee hearing on April 28, 2021, several issues related to British Columbia-Alaska transboundary mining and exploration were raised by select presenters, which were either misleading or inaccurate. Through this letter and its accompanying content, we would like to share factual and pertinent information which address these inaccuracies and provide you with broader data for future discussions.

As you are aware, Seabridge Gold is the owner of KSM, which is one of the proposed mining projects located in the transboundary region, situated between the State of Alaska and the province of British Columbia. The KSM Project received its environmental approvals from the province of British Columbia in July 2014 and from the Government of Canada in December 2014.

Contrary to the assertion made at the hearing by Breanna Walker, Campaign Coordinator at Salmon Beyond Borders, that “*few substantive changes have been made to BC mining regulation and permanent policies following the 2014 Mount Polley waste dam failure*”, the BC government has made significant legislative and regulatory changes to BC mining laws since the Mount Polley incident. These include limits to the steepness of dam slopes and all mines being inspected regularly by an independent review panel of engineers duly approved by the chief inspector of mines, the appointment of a Chief Permitting Officer to ensure the mine permitting process is efficient and effective, and creating the Mine Audits and Effectiveness Unit to ensure mining regulation in B.C. is effective and aligned with global best practices. Here are some links further outlining the changes:

- <https://www2.gov.bc.ca/gov/content/industry/mineral-exploration-mining/13315>

- <https://www2.gov.bc.ca/gov/content/industry/mineral-exploration-mining/permitting/mines-act-departures-from-approval>
- <https://www.leg.bc.ca/parliamentary-business/legislation-debates-proceedings/41st-parliament/5th-session/bills/first-reading/gov06-1>

For constructive and meaningful discussions on transboundary projects, it is vital for mining and exploration companies operating in the region to be a part of these discussions as well. As the KSM Project's mineral deposits are situated north of the BC/Alaska Border on Sulphurets Creek, a tributary of the transboundary Unuk River, since 2007 Seabridge Gold has been conducting multi-disciplinary environmental baseline data within the Unuk River Watershed. This data is collected by qualified professionals, in line with the federal, provincial, and international legislation, regulations, guidelines and standards. On the basis of this data, we had published a report titled, 'Unuk River Watershed Baseline Characterization Report (2007-2018)', which was shared with the State of Alaska and is also enclosed with this letter in a USB key for your consideration. This report will be updated every five years.

During the hearing, Chris Sergeant, Research Scientist with the University of Montana's Flathead Lake Biological Station, stated that mining companies have a conflict of interest in how data is collected in the transboundary region. We take serious offence to this baseless allegation. Seabridge follows all existing Canadian Federal and Provincial sampling requirements (which are closely compatible to Alaskan and US requirements) and guidelines, and freely shares its data with Indigenous Groups and all other stakeholders. Protecting the aquatic environment in and around the KSM Project is one of Seabridge Gold's top priorities. In fact, we are spending approximately \$1-1.5 M million annually, on water quality monitoring programs, sampling up to the BC/Alaska border on the Unuk River. Furthermore, we have proposed an extensive water management system that will not only manage water that has been in contact with mining activities but will also improve the existing naturally poor water flowing into Alaska via Mitchell Creek, Sulphurets Creek and the Unuk River during the life of the KSM Project. Quite evidently, the speaker has a conflict of interest while presenting the information because his research is dependent on the ongoing contentious discussions around transboundary mining.

The Seabridge team would be pleased to appear before the House Fisheries Special Committee to talk about our ongoing water quality monitoring program and to answer questions and/or address concerns about the KSM Project, once the impacts of the global COVID -19 pandemic have dissipated.

We would like to add that during the environmental assessment process, Seabridge worked in close collaboration with all regulators, including Alaskan State and US Federal officials (EPA, DOI, NOAA, Fish and Wildlife Service), having more than 85 different meetings and interactions with these regulators, to ensure that downstream Alaskan waters were not impacted by the proposed operations.

Voluntary Environmental Remediation at the Johnny Mountain Mine

We would also like to take this opportunity to share information about our voluntary remediation activities at another Seabridge Gold property, the Iskut Project, specifically, Johnny Mountain Mine. Being a responsible mining company Seabridge is voluntarily reclaiming the historic legacy and outstanding liabilities at the Johnny Mountain Mine site, which is also a transboundary site, located in northwest BC, over a multi-year reclamation program. To date, Seabridge Gold has spent approximately \$6 million to restore this former mine site.

Please find enclosed a USB key containing a video of the work we have done to date at Johnny Mountain Mine, in partnership with the local Indigenous group - Tahltan Nation. The overall objective of the reclamation plan for the Johnny Mountain site is to return disturbed lands and new anthropogenic landforms to their original land use and capability of alpine tundra wildlife habitat.

In closing, we would like to reiterate that the KSM project has been through extensive environmental and technical evaluations by independent experts to ensure its operations will not cause harm to the surrounding environment, including waterways and fish, and has worked closely with all stakeholders, including Alaskans, to ensure that their concerns were acknowledged and addressed throughout the environmental assessment review.

Once the KSM Project begins operations, it will be subject to monitoring requirements under a variety of approved plans including aquatic effects management, selenium management, wildlife management and the Canadian Federal Government Metal Mining and Effluent Regulations.

We hope and trust that after reviewing all the information, you will consider our recommendation of involving mining and exploration companies operating in the region to be a part of all such future transboundary related discussions.

We look forward to continuing to provide timely and factual information on the Project to Alaskan residents as the development of the Project proceeds.

I appreciate your time and would be pleased to answer any outstanding questions you have regarding the Project. I can be reached via email, brent@seabridgegold.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brent Murphy". The signature is fluid and cursive, with the first name "Brent" being more prominent than the last name "Murphy".

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

RBM/RS/...

Attachments

c.c.:

Kyle Moselle, Executive Director, Alaska Department of Natural Resources
Peter Robb, BC's Assistant Deputy Minister, Energy, Mines and Low Carbon Innovation