

August 19, 2024

Via Email: shannon@thenarwhal.ca

Attention: Shannon Waters, Mining Reporter, The Narwhal

Dear Ms. Waters:

RE: Misleading information about the KSM Project

I am writing to address information published in your August 13 article, “*B.C. is home to ‘high-risk’ toxic mine waste sites. Here are 5 you need to know about.*”

It’s disheartening to see decades of diligent work by hundreds of engineers, environmental experts, government regulators, First Nation partners, and other specialists dismissed in a mere six paragraphs, without being provided the opportunity for input. While I appreciate the inclusion of my previous statement, given the absence of an opportunity to provide further information, suggests that the article was designed to instill a false sense of fear rather than a balanced presentation of facts.

This is our sixth letter to address inaccuracies and misleading claims perpetuated by Narwhal in past articles. You can review all our previous letters [here](#).

Before I delve into again refuting your misleading claims about the KSM Project, I must point out the glaring omission of perspectives about the KSM Project from our First Nation partners, including the Tahltan, Nisga’a Lisim, and Gitxsan Nations. By not seeking their comments for the story, are you implying that the ENGOs have a better understanding of - and care more about their territories and values than the Nations themselves? And are you under the misguided belief these Nations would support the KSM Project if it jeopardizes their territory and values? - I don’t think so!

This notion undermines the sovereignty and wisdom of these First Nations and disregards their active role in ensuring the KSM Project aligns with their environmental scrutiny, values and long-term interests.

Alternatively, if you were aware of their support for the KSM Project but chose not to include their perspectives, it suggests a deliberate omission of facts to fit a narrative that seems to align more with the agenda of Narwhal. This raises serious questions about Narwhal’s adherence to its stated principles of "Follow the facts" and "Tell it like it is," as outlined on your website.

Regardless, here are some facts about Seabridge Gold's engagement with our First Nation partners and local communities over the last two decades, which have been crucial in gaining the social license to operate and ultimately achieving the substantial start designation from B.C.'s Environmental Assessment Office (EAO). Hopefully, this will help you understand that the KSM Project is not only a product of rigorous engineering and environmental planning but also of deep and sustained engagement with the First Nations and local communities who continue to play an active role in shaping its development.

- Signing benefits agreements with the Nisga'a Nation in 2014 and Tahltan Nation in 2019 whose traditional territories encompass the KSM Project. These agreements cover the protection of First Nation rights, the environment, and shared economic benefits for the KSM Project.
 - Notably, 77.8 percent of Tahltan members voted in favour of the terms of the benefits agreement
- An environmental agreement with the Gitanyow Wilps, and the Gitxsan Hereditary Chiefs Office has endorsed the Project with a letter of support for its environmental assessment approval and the substantial designation.
- Received letters supporting a positive substantial start determination by the Nisga'a Nation, Tahltan Central Government, Gitxsan Hereditary Chiefs, Village of Hazelton, District of New Hazelton, District of Stewart, Town of Smithers, City of Terrace, and the Regional District of Kitimat-Stikineii.
- [Treaty Creek Limited Partnership](#) established by the Tahltan and Nisga'a Nations in 2022, is aimed at optimizing participation and maximizing economic benefits at the KSM Project.
- We also received letters from Mayors and Councils of Smithers and Terrace supporting the Project during the environmental assessment review process.
- An independent perception audit conducted in 2020 revealed that approximately 61% of residents in northwest B.C. either strongly support or support the KSM Project.

Now, I would like to address the concerns you raised about the KSM Project using public facts and scientific evidence. I do applaud your use of the quote from B.C. Energy, Mines, and Low Carbon Innovation Minister Josie Osborne, who notes that tailings storage facilities in B.C. "must conform to one of the most stringent [tailings] regulatory frameworks in the world." Minister Osborne is correct, and she is not alone in this assessment.

The KSM Project successfully underwent a rigorous, joint harmonized Environmental Assessment review process, as mandated by the [British Columbia Environmental Assessment Act](#), the [Canadian Environmental Assessment Act](#), and in accordance with the Nisga'a Lisims Treaty. This review, conducted over seven years (2008-2014), involved more than 250 scientists, engineers, First Nation partners, and regulators who meticulously developed and reviewed all relevant information pertaining to the KSM Project. Additionally, over 15,000 people from British Columbia and Alaska actively participated in public meetings, consultations, and Project information sessions before the Project received approval. On July 21, 2014, the Canadian Environmental Assessment Agency (CEAA) released its final Comprehensive Study Report for the KSM Project which concluded that "**the KSM Project is not likely to cause significant**

adverse environmental effects taking into account implementation of the mitigation measures described in the report."

From the beginning, we have been committed to ensuring that our mining activities adhere to the highest standards of safety and sustainability. The KSM Project has been designed with stringent environmental measures to minimize its impact on the surrounding ecosystem.

More specific to tailings, your article states: "*A tailings dam failure would have 'extreme' consequences.*" No one is more aware of the critical importance of stringent tailings safety standards than us and our First Nation partners, which is why we have invested decades in planning, analysis, engineering, and expert review for our Tailings Management Facility (TMF).

The KSM Project TMF has been meticulously planned and designed to support the mine throughout its lifespan. After an extensive assessment of 14 potential sites and consultations with local First Nation groups, the current location was selected for its operational security and closure effectiveness. This site offers the most robust environmental and waste management solutions. Additionally, the chosen alpine valley location, free from surrounding glaciers, minimizes water management volumes.

These decisions were not made in isolation. They involved the collective input of experts spanning the globe. Some key points regarding the TMF include:

- Seabridge, recognizing that our Provincial Environmental Assessment Certificate was issued prior to the unfortunate Mount Polley incident (our Federal and Nisga'a approvals were issued in December 2014, after the Mount Polley incident) in response to the Independent Expert Engineering Investigation and Review Panel report on the breach of the Mount Polley, Seabridge voluntarily initiated a [Best Available Tailings Technology \(BATT\) Review](#) of the planned management approach for the KSM Project in 2015. **This study confirmed the existing tailing management facility design, consisting of centerline dams constructed with double cycloned sand and a till core in association with wet tailings deposition, is the best available technology for tailings deposition and the most environmentally responsible design to minimize long term risks associated with the proposed tailing storage facility for the KSM Project.** Please read the [BATT Report](#) and the [Plain Language Summary](#) for more information.
 - Furthermore, Seabridge also commissioned an independent review of the BATT 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 BATT report."**
 - KSM Project's TMF design (and future operations) is annually reviewed by the [Independent Geotechnical Review Board](#) (IGRB) formed by Seabridge in 2015 which is composed of world-class experts in tailings management with more than 300 years of combined experience. **In April 2016, the IGRB confirmed that the design of the proposed structures for the KSM Project were appropriate and safe.**
 - For more information about the design of the TMF, you can also visit our website (and video) [here](#).
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- The TMF will be regulated and monitored in compliance with the Canadian Dam Safety Association (CDA), International Commission on Large Dams (ICOLD), International Council on Mining and Metals (ICMM), Mining Association of Canada (MAC), and Engineers and Geoscientists BC (EGBC), along with regular reviews by Seabridge’s Independent Geotechnical Review Board.

You also cite: *“The mine’s wastewater, containing elevated metals and selenium, will require treatment for hundreds of years before release to the Unuk watershed — a watershed that supports salmon stocks of concern,” notes the [2023 report](#) on high-risk mines in B.C. compiled by SkeenaWild and the BC Mining Law Reform coalition.*

Since 2007, Seabridge Gold has been conducting ongoing water quality and hydrology monitoring within both the Unuk River, which drains into the Alaska border and tributaries of the Bell Irving River, spending approximately C\$1-1.5 million annually on these programs. Based on the data collected, it has been determined that Mitchell and Sulphurets creeks (flowing into the Unuk River) are degrading naturally, resulting in elevated concentrations of selenium and other metals within the water. Treaty Creek, located downstream of the yet-to-be-constructed TMF location also has elevated levels of minerals due to the upstream stream location of mineralized zones of exposed bedrock, which are naturally oxidizing and eroding. Hence, the water quality in these watersheds cannot be characterized as pristine. You can read the Unuk River Watershed Baseline Characterization Report (2007 to 2018) [here](#).

The data we collected (and continue to collect) within the Unuk River was further validated by Greg Tamblyn (Head of the Water Quality Section at British Columbia Ministry of Environment and Climate Change Strategy) during May 19, 2021, AK/BC Transboundary Public Meeting where Mr. Tamblyn said the data collected by Seabridge matched their findings.

Water quality flowing into Alaska will not degrade beyond levels associated with ongoing erosion as a result of the KSM Project. This includes selenium levels, which will also not increase, in waters flowing across the BC/Alaska border, within the Unuk River. On the contrary, the water management strategy we have proposed at the KSM Project will not only manage water that has been in contact with mining activities but will also improve the existing naturally poor water quality.

The pictures below demonstrate the existing natural conditions around the KSM Project and the current water quality issues in this region.



Photo 1: Confluence of Sulphurets Creek with the Unuk river depicting the impact of the natural erosion of the upstream mineral deposits on the regional water quality. The confluence is located approximately 22 miles upriver from the Alaska/BC border.



Photo 2: The Mitchell Deposit highlighting the natural erosion and oxidation processes at work. Please note the presence of "green" copper sulphate staining in the middle left portion of the photograph.



Photo 3: Existing conditions at the KSM and downstream areas. Seep water near the Mitchell Glacier Toe.

In conclusion, Seabridge Gold remains fully committed to transparency, safety, and sustainability in all aspects of the KSM Project. The decisions and designs we have implemented are the result of years of rigorous analysis, expert input, and meaningful engagement. We stand by the integrity of our work and the collaborative efforts with the government, our First Nation partners and local communities that have led us to this point.

Accurate, fair, and balanced reporting is essential for fostering a well-informed public dialogue about the mining industry for public awareness but more importantly for the local and First Nation communities that rely on the industry. Having shared information about the KSM Project in six letters, we hope that any future article about the KSM Project in Narwhal will be grounded in factual evidence and a balanced understanding of the comprehensive measures we have undertaken to safeguard both the environment and the communities where we operate.

If you ever wish to discuss the Project, require accurate information about the Project for future stories or learn how we are advancing the KSM Project using the best available technology,

responsible practices and most importantly, collaborative relationships with our First Nation partners and stakeholders, you can reach out to me via email - brent@seabridgegold.com.

Respectfully yours,



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CC - Emma Gilchrist Editor-in-chief/Executive director, Narwhal
