

Opinion Article for the Anchorage Daily News

## KSM Project Meets Substantially Started Determination Criteria

By R. Brent Murphy, Senior Vice President, Environmental Affairs, Seabridge Gold

Having spent my entire career at the intersection of mining and sustainability, I have grown accustomed to the widespread misinformation surrounding our industry. Unfortunately, it's a reality my colleagues and I face daily on a global scale, and if we responded to every instance, we would have little time left for the work that truly matters.

However, the sheer level of inaccuracy and hypocrisy regarding the Substantially Started Determination (SSD) status for our proposed KSM Project in Brian Lynch's recent article "[Canada's rubber-stamp mining decision could endanger Alaska salmon](#)" demands a response. First and foremost, the article fails to acknowledge several key facts - whether due to oversight or insufficient research - regarding our two decades of dedicated efforts and nearly CAD \$1 billion of investments to responsibly advance the KSM Project.

The British Columbia (BC) Environmental Assessment Office (EAO) determines three key factors while considering granting the SSD status to a project – **whether work has begun on the project components authorized within the Certified Project Description (CPD), the amount spent on the Project construction activities and the support of our First Nations Partners.** In each category, the KSM Project has met or exceeded EAO's criteria.

Given that the world urgently needs critical minerals like those at KSM (copper and molybdenum), it's important that we are guided by fact-based discussions. Allow me to set the record straight.

### Overview of Physical Works Authorized Within the CPD

While it's true that Seabridge Gold has completed the 17 km Treaty Creek Access Road, identified as a component in the CPD, the article conveniently ignores the critical details regarding the extensive work already underway and close to CAD \$500 million investment since 2021 alone to develop several main Project components which contributed to achieving SSD status.

Seabridge has initiated works on [six out of 32 physical project components](#) authorized within the CPD. This includes tree clearing and earthworks activities on the site of the main project components - the mine site and the processing and tailing management Area. Substantial progress has also been made on developing permanent infrastructure for electrical power supply and distribution component including clearing 75.9 hectares for the Treaty Switching Station and initiating installation of the foundations for the Station's main infrastructure. To date, over CAD \$80 million has been paid to advance construction of the

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switching station for BC Hydro to build system reinforcements. In total 363 hectares of disturbance have taken place, or 15 percent out of a total of 2,354 hectares of disturbance that would be required to complete the construction phase.

Beyond what is outlined in the CPD, Seabridge has also made significant strides in the physical works of other vital Project components, including three camps, mine site roads, and the Glacier Creek Fish Habitat Offsetting Project, further underscoring the scale of work already completed.

I could go on, but it's abundantly clear to anyone who cares to look that the SSD status was solely achieved as a direct result of work completed or initiated to develop the Project and not because Seabridge is seeking an investment partner as suggested in Mr. Lynch's article.

### **Support of First Nations Partners**

I was also surprised to see Mr. Lynch indirectly dismiss the opinions of our First Nations partners. Does he believe these Nations would support the KSM Project if it posed a threat to their territory and values?

In fact, the KSM Project enjoys strong support from its First Nations Partners who - based on the substantial work completed so far - believe it merits SSD status. Their confidence is reflected in the letters of support from the Nisga'a Nation, Tahltan Central Government and Gitksan Hereditary Chiefs, which were considered by the EAO as part of the evidence for granting SSD status.

Furthermore, the Impact benefits agreements we have signed with the Nisga'a and Tahltan Nations whose traditional territories encompass the KSM Project and our support for the establishment of the [Treaty Creek Limited Partnership](#) by these Nations aimed at optimizing participation and maximizing economic benefits at the KSM Project further demonstrates our mutual commitment to advance the Project responsibly and collaboratively.

### **Continuous Engagement**

Successfully completing the BC and Canadian Environmental Assessment (EA) review and meeting the requirements of the Nisga'a Final Agreement and receiving SSD status are indeed major milestones for the KSM Project, but they do not mark the end of the public review process. We remain committed to continuing to work closely with our First Nation partners, actively incorporating their insights and feedback while applying for any additional permits needed from the Canadian and BC governments to advance the KSM Project. Their continued involvement ensures they play a key role in guiding its responsible development and ensuring it aligns with their values and priorities. Seabridge has also worked closely with Alaskans, to ensure that their concerns about the KSM Project were acknowledged and addressed throughout the environmental assessment review.

Like any major mining project, the Canadian and BC governments are and will continue to carefully consider the latest predictions and future implications of the KSM Project before issuing any additional permits. However, based on the extensive database we have collected for

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the KSM Project, we are in a strong position to secure these permits and move forward responsibly.

### **Safe Management of Tailings**

Although the provincial Environmental Assessment Certificate for KSM was issued prior to the unfortunate Mount Polley incident (the Federal and Nisga'a approvals were issued in December 2014, after the Mount Polley incident), Seabridge has taken significant steps to ensure that the proposed design of the tailing management facility (TMF) is based on industry-leading best practices and best available technologies.

In 2015, we voluntarily initiated a [Best Available Tailings Technology \(BATT\) Review](#) of the planned management approach for the KSM Project which **confirmed our design is the best available technology for tailings deposition and the most environmentally responsible**. An independent review of the BATT report by Dr. Dirk van Zyl, a world-recognized expert who also sat on the Mount Polley Independent Expert Review Panel supported this [conclusion](#). Furthermore, the TMF is annually reviewed by the [Independent Geotechnical Review Board \(IGRB\)](#) formed by Seabridge in 2015, which is comprised 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.**

### **Water and Salmon**

Finally, any suggestion that the KSM Project will negatively impact salmon runs is not based in fact.

It has been established that [rising water temperatures and overfishing are significant factors](#) affecting salmon populations in Alaska. [Water quality and hydrology monitoring sampling](#) we have been conducting up to the BC/Alaska border on the Unuk River since 2007 also clearly identifies that the water in the Unuk River is naturally impacted by the natural weathering and erosion of mineral deposits exposed at the surface, due to the recession of local glaciers.

My colleagues and I have dedicated years to traveling across the transboundary region, engaging with thousands of people on both sides of the border. This feedback and concerns have been crucial in shaping the KSM Project resulting in the development of a responsible project design. While this work has been challenging, it has been incredibly worthwhile. We remain committed to the integrity of our work and the collaborative efforts with the BC and Canadian governments, our First Nations partners, and local communities that have brought us to this point and will continue to advance the KSM Project responsibly. For information about the KSM Project, please visit [www.ksmproject.com](http://www.ksmproject.com).

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