

SEABRIDGE GOLD

January 27, 2025

Via Email: asft.director@gmail.com

To: Paul Olson, Author of 2024 SeaBank Annual Report
Willow Moore, Operations Director, Alaska Sustainable Fisheries Trust
Linda Behnken, Director and President, Alaska Sustainable Fisheries Trust

Hello Mr. Olson, Ms. Moore and Ms. Behnken,

RE: Immediate Correction of Inaccuracies about KSM Project published in the ‘2024 SeaBank Annual Report’

With reference to the “2024 SeaBank Annual Report,” we request an immediate correction of the various misleading information published about Seabridge Gold’s KSM Project. The report misrepresents the KSM Project and unjustly tarnishes our reputation as a responsible developer.

Your report relies heavily on incorrect information published by ENGOs and individuals with a clear agenda of opposing the KSM Project, such as Rivers Without Borders and B.C. Mining Law Reform. These groups have repeatedly disseminated misleading and baseless claims about the KSM Project, which we have publicly debunked on multiple occasions. By citing information from these reports, you are inadvertently perpetuating misinformation that has already been refuted. **You can read all the letters we have sent to these ENGOs over the years [here](#).**

Your audience deserves accurate and well-researched information, and we want to take this opportunity to directly provide you with facts about the KSM Project and offer you the chance to rectify the misinformation in the report. Additionally, moving forward we kindly request that you refrain from relying solely on information from these ENGOs and instead reach out to us directly for accurate, verified details about the KSM Project. This will help ensure that your report reflects a balanced and well-informed perspective about the KSM Project.

Environmental Assessment Approvals

Contrary to the claims in your report, the KSM Project received approval under the [Canadian Environmental Assessment Act](#) in December 2014- four months **after the unfortunate Mount Polley incident (August 2014)**. This provincial and federal environmental assessment (EA) 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 BC and Alaska actively participated in public meetings, consultations, and Project information sessions before the Project received approvals in 2014.

The seven-year review process for the KSM Project also included 36,000 pages of scientifically rigorous information compiled by over 250 independent scientists from across 20 disciplines. This information underwent thorough scrutiny by the Canadian and British Columbian Environmental Assessment Agencies, 20 U.S. Federal and Alaska regulatory agencies and the Nisga’a Lisims’ Government and independent regulators. Since receiving approval, we have continued to engage with our stakeholders to

ensure we are implementing robust environmental protections to ensure the project aligns with the highest standards of responsibility and sustainability.

It is also crucial to note that the approval of the KSM Project was based on the understanding that there would be no negative effects on the downstream water, aquatic life, or the surrounding communities.

The Canadian Government, as represented by the former Minister of the Environment, in her decision statement approving KSM, concluded *“The project is not likely to cause adverse environmental effects as defined in the former Act (referring to the Canadian Environmental Assessment Act 19912), taking into account the implementation of mitigation measures described in the report” and “the mitigation measures and follow up programs described in the Report are appropriate for the project.”*

Furthermore, the Minister, in making her decision, relied upon a Canadian Environmental Assessment Agency scientific report which stated, *“The agency has concluded that no significant adverse impacts on water quality, water quantity, fish, or human health are expected on the Alaskan side of the Unuk River.”* You can access the report [here](#).

It is deeply disheartening to see decades of meticulous work by hundreds of engineers, environmental experts, government regulators, First Nation partners, and other specialists so casually dismissed in your report.

Engagement With Alaska

The KSM Project’s Tailings Management Facility is **located in the upper reaches of the Bell Irving River Basin and drains into Canadian waters, not the Unuk River, or any other US waterway**. The KSM Project’s mineral deposits are situated geographically north of the BC/Alaska Border on Sulphurets Creek, a tributary of the transboundary Unuk River, an area in which both the BC and Canadian governments allow responsible mineral exploration and mining to occur.

Even though the KSM Project does not require any permits from US jurisdictions, including Alaska, due to the deposit’s location, Seabridge worked extensively with Alaskan State and US Federal regulators to understand and address the concerns of Alaskans. During the KSM’s EA process, we responded to more than 400 comments relating to the BC-Alaska Transboundary concerns. Throughout the EA process and after, we also voluntarily conducted 140 meetings/interactions with Alaskans who expressed the same concerns as Canadians, and all concerns were given equal weight in the assessment process and ultimately were fully mitigated within the design of the proposed project, which **subsequently increased the projected capital cost by more than \$300 million**. Key design changes include –

- Incorporating lined centre cell in Tailings Management Facility to store tailings.
- Changed the water management approach on the mine side of the Project, to time the discharge of mine impacted waters with high seasonal flows.

Proposed Selenium Treatment Technology at the KSM Project

The report’s implication that selenium treatment technologies are immature is both outdated and misleading. During the KSM Project’s EA process, potential impacts to the environment arising from selenium and other naturally occurring metals were thoroughly evaluated and assessed. In fact, the BC EA process required Seabridge to evaluate and adopt an effective selenium treatment technology for the KSM Project; it was a legally binding condition for the EA.

Towards that end, Seabridge adopted Selen-IX™ technology developed by selenium technical experts BioteQ Environmental Technologies, Inc. In 2015, Seabridge successfully completed a pilot plant evaluation of this new process for the removal of selenium from waters in northwest BC, proving that the technology works. The Selen-IX™ treatment technology was able to reduce selenium concentrations to 1 ppb in water extracted from the KSM Project site. The technology was issued a US patent in 2018 further validating Seabridge Gold's chosen approach for selenium treatment at the KSM Project.

Over the last years, there has been a major increase in the number of projects where Selen-IX™ was selected as the treatment technology of choice by project owners, approved by regulators, and advanced into implementation. In 2020, BQE Water completed the commissioning and Performance Test of the First Selen-IX™ Plant for Selenium Removal at the Kemess Property in BC for which it earned the Environmental Award from the Engineers & Geoscientists British Columbia and the Clean50 Top Project Award by Delta Management Group. **Additionally, two Se treatment plants utilizing the same technology as planned for the KSM Project are also operating in the US.** These advancements clearly demonstrate the maturity and efficacy of Selen-IX™ as a proven technology. I note that these facts were conveniently omitted from your article.

KSM's Proposed Tailings Management Facility (TMF)

The KSM Project's TMF has been designed to meet the highest standards of safety and environmental stewardship. While it is true that KSM will have the tallest tailings dam in British Columbia, it is worth noting that the Cerro Verde and Antamina mines in Peru, and the Bagdad mine in Arizona are currently operating safely with dams of similar or greater height than the proposed KSM Project. Once built, the KSM Project will have a lifespan of 50+ years. The Project's TMF was designed with consideration for that long lifespan and the resultant tailing volume to be stored. Using the best available technology, the facility as is currently designed can safely and securely store 2.3 billion tonnes of tailings.

The report's claim that 2.3 billion tonnes of acid-generating tailings will be stored underwater is blatantly inaccurate. In reality, only 10% of the total tailings will be potentially acid generating material, while the remainder of the material will be similar to inert beach sand. These potentially acid generating tailings will be carefully deposited in a lined central cell, stored underwater, and completely isolated from the natural environment (i.e. there will be no drainage from this cell to the receiving environment) and the rest of the TMF to mitigate potential acid generation and to prevent impact within the receiving environment.

Furthermore, the KSM's TMF was assigned a consequence classification of "Extreme" based on the potential environmental consequence category. In line with standard dam safety practices, the consequence classification for KSM's TMF was assigned without consideration of likelihood or credibility and assuming the potential failure has occurred. This is an important distinction in understanding exactly what defines a consequence classification.

The location of the TMF site was selected after completing an extensive alternative assessment **which examined 14 different sites and consultations with local Indigenous groups.** The site was chosen owing to its stable geological conditions, potential to minimize environmental impacts including those associated with land disturbance and aquatic impacts, and for being the most secure site from operability and closure perspectives. Additionally, water management volumes are also minimized as TMF is located in an alpine valley with no surrounding glaciers. KSM has been designed to exceed the highest Canadian Dam Safety Guidelines to mitigate earth tremors from seismic activity. **This design would allow the Tailings Management Facility dams, Water Storage Facility dams and Rock Storage Facilities to**

withstand 1 in a 10000-year seismic event. For detailed information about the design of KSM's TMF, you can watch this [video](#).

Additionally, it is critical to address the credibility of the sources cited in your report. You referenced Mr. Emerman, who is not a professional engineer registered in British Columbia. His lack of accreditation raises serious and significant questions about his qualifications, credibility and his understanding of BC's rigorous regulatory requirements for tailings dam design.

Below, I also added some additional information about the KSM Project's proposed TMF which we think you might find useful:

- 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 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.**
- Seabridge Gold also voluntarily initiated a Best Available Tailings Technology (BATT) Review of the planned management approach for the KSM Project as we wanted to ensure again that the best and safest approach for tailings management had been selected. **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. Please read the [BATT Report](#) and the [Plain Language Summary of the BATT Report](#) to learn more about tailings management at the KSM Project and the conclusions from the study.**
- 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."**
- 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.

Water Quality of the Unuk River

Since 2007, Seabridge has been conducting water monitoring and sampling up to the BC/Alaska border on the Unuk River, spending approximately \$1-1.5 M million annually. The baseline data we have been collecting clearly **identifies that the water in the Unuk River is naturally impacted by the weathering and erosion of mineral deposits exposed at the surface, due to the recession of local glaciers.** In particular, Sulphurets Creek, one of the largest tributaries of the Unuk River, receives inputs from several smaller tributaries, the largest being Mitchell Creek. The naturally occurring acid rock drainage has already impacted the water quality of Mitchell Creek, Sulphurets Creek and the Unuk River.

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



The confluence of Sulphurets Creek with the Unuk River depicting the impact of the natural erosion of the upstream mineral deposit on the regional water quality. The confluence is located approximately 22 miles upstream of the Alaska/BC Border.



The confluence of Mitchell and Sulphurets Creek depicting the impact of the natural erosion of the upstream mineral deposit on the regional water quality.

We understand you are concerned about the salmon population in the Unuk River, however, suggesting that the KSM Project will negatively impact salmon runs is not based on fact. In reality, it has been established that [rising water temperatures and overfishing are significant factors affecting salmon populations in Alaska](#).

Engaging With Our Canadian Indigenous Partners

It is well-known that in Canada, no project can advance without the approval and support of the Indigenous groups on whose territory the project is located. The KSM Project is no exception. We take pride in the strong relationships we have established with our Indigenous partners in northwest BC through early, frequent, and transparent communication. This collaboration has resulted in comprehensive Benefits Agreements with the Nisga'a Nation and the Tahltan Nation, on whose traditional territory the KSM Project is located. These Nations attach high importance to protecting their ancestral lands and will only support development projects that ensures the protection of their territories (including the salmon and water) and aligns with their values.

In the report, you acknowledged the deep and enduring connection Alaskan Native Tribes have to their territories. However, it is equally important to recognize and acknowledge the perspectives and decisions of Canadian Indigenous groups, who have thoroughly reviewed and supported the KSM Project, and share similar values and commitment to environmental stewardship toward their territories. The decisions and designs we have implemented for the KSM Project are the results of decades of rigorous analysis, expert input, and meaningful engagement across BC and Alaska. We stand by the integrity and transparency of our work, which reflects our unwavering commitment to environmental stewardship and responsible development.

As the world urgently seeks critical metals like copper to support the transition to a sustainable and low-carbon economy, we are proud to be part of the solution and play a vital role in meeting this demand. Seabridge Gold will continue to responsibly advance the KSM Project while adhering to the highest standards of environmental and social responsibility.

We respectfully reiterate our request for the Alaska Sustainable Fisheries Trust to immediately retract the inaccurate information published in the *2024 SeaBank Annual Report*. I also invite you to engage with us directly if you have any further questions or would like to discuss the KSM Project in more detail before publishing any further claims regarding the KSM Project. You can reach me via email at brent@seabridgegold.com or by telephone at (416) 367 9292.

Sincerely,



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

cc. Terri Lomax
Alaska Transboundary Coordinator
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