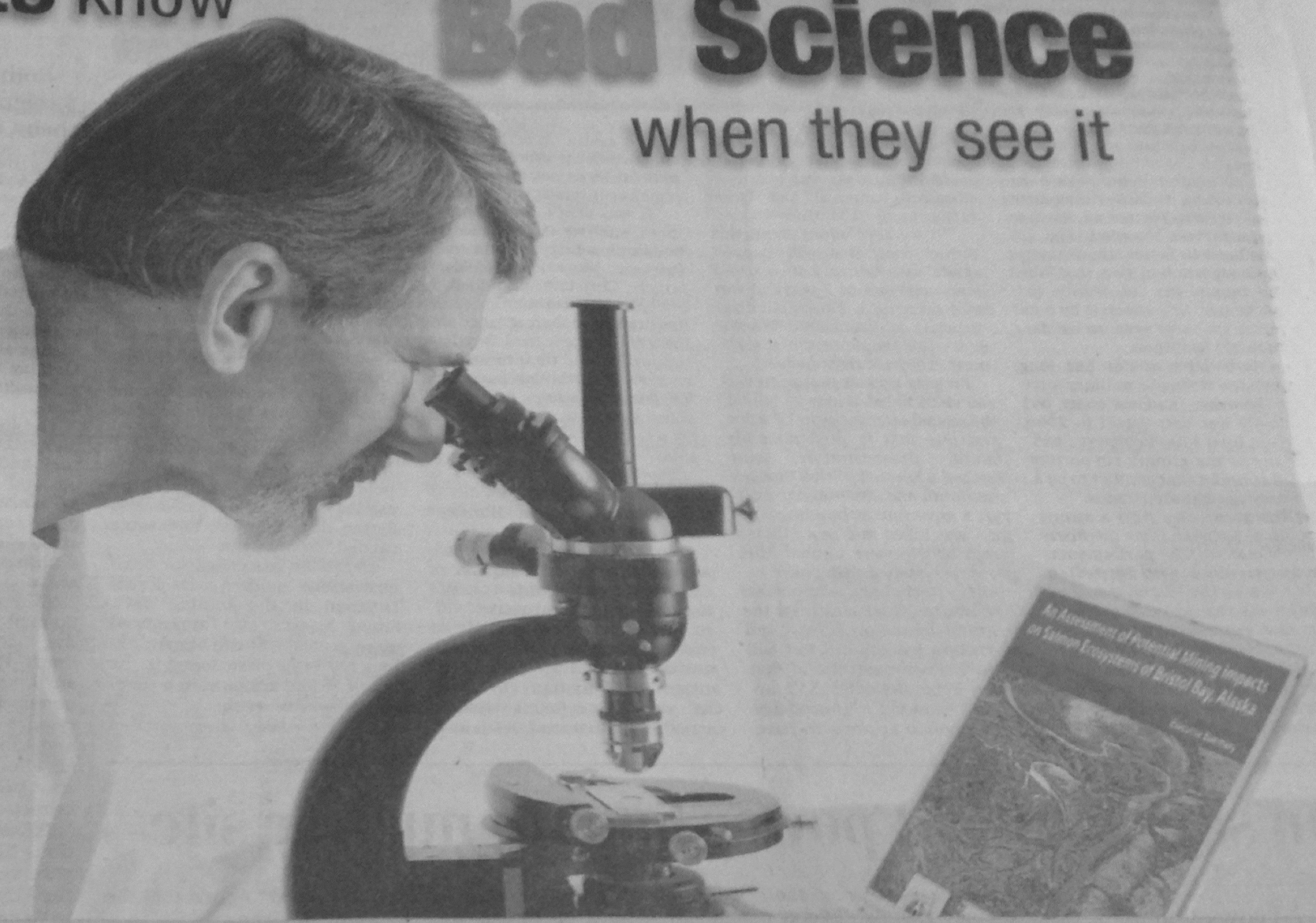
Scientists know Bad Science when they see it



The EPA recently completed an assessment of mining in Bristol Bay, Alaska.

What's wrong with that?

The agency did so before an actual development plan for the Pebble copper and gold mine has even been filed by the partnership that wants to develop it. Now the EPA is stuck with a premature, rushed, and error-filled document that predicts unsupportable impacts from a hypothetical mine. And the agency's own independent scientific review panel seems to agree, one even calling a section of the report "hogwash." The Pebble mining project must be assessed, but through a microscope of reality, objective science and serious analysis. It's time for the EPA to throw out this failed experiment and start all over.

Quotes from members of the EPA's Scientific Review Panel in response to the agency's Bristol Bay Watershed Assessment, Anchorage, AK, August 8, 2012

- "We do have concerns, of course, with the fact that because this is theoretical, because you don't know exactly how it's being built [the actual Pebble Project], you really can't evaluate with any degree of specificity what the potential effects are associated with that."
- "There is no attention to any regulatory framework in terms of mitigation or in terms of how this mine is going to be developed."
- "…many of the comments yesterday were on the timing of the document, and I think it would be advantageous for the credibility of the report for EPA to address it. Why was the thing turned around in 11 months versus the 5 to 9 years which I heard repeatedly?"
- "…this is such a hypothetical sort of an approach… I can't tell you what fish are going to be exposed to because I can't tell you if this mine is two square feet or two hundred square miles."
- "I was unpersuaded by the statistical probabilities that were assigned to various scenarios like the possibility of a TSF dam failure, one in how many thousand years, or 10,000 years, per dam year, all that. You know that was just hogwash."
- "The concern, and expressed by almost everybody as we go through this, is that there is a lack of data."
- "I would suggest that the failure likelihoods are over estimated for the type of facility and the type of management of the facility that we'll see at this specific location."
- "Based on this very general risk conclusion… it is likely that there would be significant loss of salmon subsistence resources related to the mine footprint. How did they figure that out? It's just beyond me. How was that conclusion reached?"
- "If I'm an ecologist and I can pick this stuff up…I just wonder how many more errors have been made…"
- "There's too much uncertainty to really determine, to me, from this document the risk of developing a project like this in the watershed."
- "…the thing that we also need to keep in mind is that this is hypothetical, and so the validity of the conclusions that are reached as a result of the risk assessment are only as good as the information upon which they're based."

This message is brought to you on behalf of the American shareholders of Northern Dynasty Minerals Ltd., a 50% owner of the Pebble Project.