

Emerman Report Response

October 3, 2023 – Pueblo Viejo is aware of the recently released report authored by Steven Emerman and commissioned by ENTRE (National Space for Transparency in the Extractives Industries), Earthworks and MiningWatch Canada (“**Report**”). The Report proclaims to review the Environmental and Social Impact Assessment (“**ESIA**”) for the Naranjo TSF done for Pueblo Viejo’s construction of a new tailings storage facility. In this statement, Barrick offers a response to the Report, which does not withstand any level of scientific scrutiny.

Background

As explained in more detail below, Pueblo Viejo’s ESIA is the product of a comprehensive, robust, and careful assessment done in accordance with industry best practice. It was compiled by a multi-disciplinary team comprised of many independent international and local experts, over a 28-month period, with ample opportunity for Government and other stakeholder engagement.

The Report, in contrast, is based on Mr. Emerman’s limited work. Mr. Emerman’s “findings” lack sufficient evidentiary foundation, drawing by and large on a mere desktop review coupled with a 5-day visit to the Dominican Republic that Mr. Emerman completed in July 2023 without even visiting the mine or any engagement with Barrick or Pueblo Viejo.

Both the process leading up to the issuance of the Report and its dissemination have been wholly lacking transparency and visibility. It must be noted that Mr. Emerman’s Report was never provided to Pueblo Viejo or Barrick, despite repeated requests—see letters dated [September 8, 2023](#), and [October 1, 2023](#). Nor did any of the organizations sponsoring the Report or Mr. Emerman seek to engage in any capacity whatsoever with Barrick or Pueblo Viejo.

This deliberate failure of engagement and transparency is unfortunately consistent with the approach that the Report’s sponsoring organizations have taken to date. They did not utilize the opportunity to raise their concerns during the regulated, internationally established, and well-understood ESIA process. In this case, that process ran for well over 2 years, as noted above, and provided all interested and affected parties with the opportunity to receive project information, provide comments and questions, give input into the design of the project, and have a say in the permitting process through the Public Participation Process.

Moreover, when Mr. Emerman visited the Dominican Republic to conduct his review, he failed even to contact Pueblo Viejo to request a visit of the mine or receive further information that would surely be relevant to any serious review of an assessment like the ESIA. Accordingly, although Mr. Emerman suggested in his Report that he “... visited the sites of the existing El Llagal installation...”, that allegation is false; in fact, Mr. Emerman was *not* on site and did *not* visit the current facility. Barrick understands that Mr. Emerman is again in the country—now to present his “findings”—but he has not engaged with Barrick or Pueblo Viejo to share those findings.

Having received the Report from an alternative source, Barrick, along with its in-house experts and independent scientists and engineers, has conducted a high-level review of it. Through the review, it is evident that Mr. Emerman's "findings" lack supporting data, facts and analysis, were not subject to peer review and validation, and are in large parts contradictory. Given these shortcomings, the Report is at best an attempt to produce a subjective "white paper" on Tailings Storage Facility development globally, with references to numerous facilities and sites that have little to no relevance to the actual TSF project that Pueblo Viejo has studied for numerous years and for which it has received the legally regulated environmental permit. In short, as developed further below, Mr. Emerman's work falls well short of an independent, rigorous, and scientific examination of the facts.

Mr. Emerman and the Sponsoring Organizations Chose Not to Engage with the Scientific and Public Participatory Process Undertaken by Pueblo Viejo

Pueblo Viejo has previously described the thorough process through which the environmental, social and engineering aspects of the new TSF project have been studied and assessed over several years. This commenced with a comprehensive site-selection process and Multi-criteria Alternatives Analysis (MAA)—as per the Global Industry Standard on Tailings Management ("**GISTM**")—prepared in consultation with the local communities and Government. Thereafter, a team of international experts completed a number of specialist studies that informed the ESIA. The communities around the mine, various authorities, and numerous interested stakeholders were kept informed regarding the project and how they could be part of the process. Extensive and transparent consultation took place, with over 3000 meetings with community members, including one-on-one engagements. As part of the public participation process, we conducted two open and public townhall meetings, which were advertised in local and national media and attended by more than 1 500 participants.

Despite ample opportunity to do so and for reasons unknown to us, ENTRE, MiningWatch Canada, and Earthworks did not participate in the process. Instead, these organizations waited until the process was completed and then sought to discredit the work that Barrick and independent experts had done. Mr. Emerman also remains silent on the Government of Dominican Republic's own independent process for evaluating appropriate sites. In these circumstances, Mr. Emerman alludes to the Government having access to information that he does not, but unfortunately does not appear to have made any attempts to become better informed and understand this.

Mr. Emerman's Finding That Pueblo Viejo Failed to Consider In-pit Deposition Is False and Irrelevant

Mr. Emerman's central "finding"—the suggestion that in-pit deposition was not considered in the site-selection or MAA process—is both false and irrelevant.

It is false because Barrick *did* consider in-pit deposition. Indeed, along with a multi-disciplinary team of tailings engineers, geotechnical experts, and environmental scientists, Barrick considered numerous sites for tailings storage (including, amongst others, separate impoundment facilities, filtered tailings, and in-pit tailings deposition).

More importantly, Mr. Emerman's criticism is beside the point. As Mr. Emerman himself recognizes, Barrick is a pioneer in the practice of in-pit tailings. It has applied this approach at many of its sites and

fully appreciates its potential benefits where it is feasible and safe to do deploy the approach. That is not the case, however, at Pueblo Viejo.

The most obvious reason for not advancing in-pit tailings deposition to a feasible alternative is that the pits on the mine are all still active and are the source of the material from which the tailings in question would be generated. This would have been evident had Mr. Emerman visited the mine or engaged with Barrick. And, although Mr. Emerman suggests that deposition of tailings in active pits has been successfully done elsewhere, he fails to provide any such examples.

In any event, notably, the pre-screening assessment of in-pit deposition was not further advanced based on the reasons explained above and on the principle of long-term environmental and community safety, which Mr. Emerman subscribes to in his report. However, once mining is complete, our closure plan includes the rehandling of significant quantities of waste rock back into the open pit. The currently active pits at Pueblo Viejo are expected to recharge with water in the post-closure period, inundating any backfill that would be in the pit. Through extensive studies and geochemical analysis, the mine has prioritized the backfilling of the pits with potential acid-generating waste rock material at closure. This would allow the waste rock to be submerged and reduce oxidation that could lead to the generation of acid rock drainage after closure and potentially impact downstream water bodies. The studies concluded that the placement of waste rock in the pits as opposed to nonreactive tailings material would be more effective at reducing post closure water impacts.

Other Flaws in Mr. Emerman's Report

Mr. Emerman's other criticisms and complaints are similarly misplaced, and his views are by and large unsupported. By way of example only and without purporting to offer a comprehensive response, we highlight a few salient shortcomings of the Report.

First, Mr. Emerman's assertion that Pueblo Viejo ought not to have considered costs because "*GISTM clarifies that multi-account analysis should not include cost as a factor in selecting the preferred alternative*" is inaccurate. Barrick, as Mr. Emerman mentions, is a member of the International Council on Mining and Metals and conforms to the GISTM. As mentioned above, the studies and site selection process were done in alignment with such standard and the process was reviewed by a panel of independent internationally recognized experts. It is clear from our review that Mr. Emerman has misunderstood and misinterpreted the GISTM, which, in Principle 4, requirement 4.2, provides for "*the objective of maintaining flexibility in the development of a new tailings facility and **optimising costs** while prioritizing safety throughout the tailings facility lifecycle*" (emphasis added).

Second, Mr. Emerman wrongly insinuates that Barrick's approach does not emphasize safety. But the sole objective of the GISTM—which guided Pueblo Viejo's process—is to *strive to achieve the ultimate goal of zero harm to people and the environment, with zero tolerance for human fatality*. Mr. Emerman's alarmist claim to the contrary is entirely unsubstantiated.

Third, Mr. Emerman's attempt to discredit not only Barrick, but the Government, goes nowhere. Barrick's MAA process, and the Government's separate and standalone site-selection process, aligned in their respective outcomes for the most suitable location for the tailings facility. Mr. Emerman points to no concrete evidence showing any shortcomings in the Government's process or why the converging conclusions of Barrick and the Government are not to be accepted. Instead, the Report often quotes a

paper that Mr. Emerman co-authored with some of the very individuals—like Ms. Jan Morrill—who commissioned the Report.

Fourth, Mr. Emerman's strained comparison between tailings facilities and water-retention dams is nonsensical and misleading. In addition, no evidence or scientific backing at all was provided to support the statement that the existing El Llagal facility—which Mr. Emerman has never visited—is untested.

Finally, Mr. Emerman provides an incomplete account of his interactions with the local community. Tellingly, there is no mention of any community engagement outcomes during the "review." Moreover, Mr. Emerman omits that the meetings he did arrange were met with some community resistance for certain communities and some were poorly attended. Indeed, it was clear that, at those community meetings that did take place as part of the disclosure and engagement process of Pueblo Viejo, community members showed overall support for the project.

Conclusion

Even the most cursory examination reveals that the Report is riddled with partial and flawed opinions derived from limited research and analysis. It was undertaken at the behest of sponsoring organizations with a clear agenda, and it cannot and should not be passed off as an independent scientific investigation.

In these circumstances, Barrick must caution against placing any reliance on the contents of the Report and the allegations made by those backing it. Mr. Emerman and the sponsoring organizations have deliberately chosen to operate outside of regulated and internationally accepted processes. Their tactic to disseminate alarmist statements in an attempt to discredit the serious work done by Barrick and the Dominican Republic, in consultation with local communities and other stakeholders, all while ignoring the legitimacy of those participatory processes.

It is emblematic that, even now, Mr. Emerman's and the sponsoring organizations' lack of transparency and refusal to engage persist. Despite reaching out to both on more than one occasion, neither Barrick nor Pueblo Viejo has received any response to letters requesting a copy of the Report. As stated above, it was only because other sources chose to share the Report with Barrick that we have had an opportunity to review and comment on it.

At Barrick, we will continue to hold true to our DNA. We will work constructively and in partnership with our neighboring communities and our host Government at the local, regional, and national levels to ensure that Pueblo Viejo remains a success and that our projects are implemented to the highest standards. We will remain, as always, open to frank and honest engagement with legitimate interested parties.