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May 18, 2022

Debra Sikora – Chair, Joint Review Panel, Marathon Palladium Project
c/o Impact Assessment Agency of Canada
160 Elgin Street, 22nd Floor
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Natural Resources Canada's Closing Remarks to the Joint Review Panel for the Marathon Palladium Project

Dear Debra Sikora,

Natural Resources Canada (NRCan) has participated in the environmental assessment of the proposed Marathon Palladium Project (the Project) as a Federal Authority that is in possession of specialist or expert information or knowledge with respect to the Project, pursuant to Section 20 of the *Canadian Environmental Assessment Act*, 2012.

NRCan provided expertise to support the environmental assessment of the Project in the areas of seismicity, surficial and bedrock geology, hydrogeology, geochemical characterization, caribou habitat suitability and functional landscape connectivity. On February 25, 2022, NRCan provided its final recommendations to the Joint Review Panel which can be found on the Canadian Impact Assessment Registry ([CIAR#1079](#)).

NRCan staff from the Office of the Chief Scientist, CanmetMINING and the Geological Survey of Canada participated in the public hearings that took place from March 14 to April 13, 2022. Research Scientists delivered presentations and provided NRCan's final recommendations in the areas of bedrock geology, hydrogeology and acid-rock Drainage and metal leaching during the Aquatic Environment Session on March 18, 2022.

NRCan reviewed GenPGM's additional information on Boreal Caribou specifically GenPGM's response to Undertaking #18 ([CIAR#1209](#)). NRCan's comments are included in Attachment 1 of this letter.

In review of the information presented and discussed during the Public Hearing proceedings, NRCan wishes to confirm with the Joint Review Panel that the advice and recommendations provided by NRCan to date represent the department's final advice for this process.

NRCan would like to thank the Joint Review Panel, the Impact Assessment Agency of Canada, and the Ontario Ministry of the Environment, Conservation and Parks for facilitating an efficient virtual hearing process and providing the opportunity to participate. NRCan will continue to provide expertise as related to its mandate as needed in the next steps of the process.

Sincerely,

Original signed by

Peter Unger

Director, Impact Assessment Division
Office of the Chief Scientist
Natural Resources Canada

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ATTACHMENT 1 : RESPONSE TO UNDERTAKING #18 (BOREAL CARIBOU HABITAT)

NRCan acknowledges the updated connectivity analysis provided by GenPGM in Undertaking #18 (Clarifications on the caribou connectivity analysis, [CIAR#1209](#)).

However, in review of the information presented therein and also discussed during the Public Hearings, NRCan maintains that the analysis provided by GenPGM underestimates the potential risk to caribou habitat connectivity. GenPGM's assessment does not consider the spatial extent of caribou avoidance behaviour as documented in the peer-reviewed literature and lacks data-substantiated movement corridors around the project site. Nonetheless, the updated connectivity analysis corroborates GenPGM's statement that "*caribou passage through the Site Study Area (SSA) will not be possible during construction/operations phases*" (Undertaking #18, [CIAR#1209](#)). This is a matter of concern, for as mentioned in NRCan's final written submission ([CIAR#1079](#)), maintaining connectivity between suitable habitats is critical for population recovery in managed forest landscapes. In addition, given that post-closure restoration of suitable habitat conditions will take decades to occur (≥ 40 years), functional barriers to caribou dispersal attributed to the mine can be expected to persist on the LSCR landscape for half a century or more.

NRCan would like to reiterate that it supports Environment and Climate Change Canada's conclusions and recommendations related to caribou habitat suitability and connectivity, as the lead federal department for the *Species at Risk Act*

NRCan remains committed to working collaboratively with federal and provincial partners, Indigenous communities and other stakeholders on species at risk caribou habitat related to this project.