



May 18, 2022

VIA EMAIL

Cindy Parker, Co-panel Manager
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Dear Ms. Parker:

RE: Closing Remarks on the Environmental Impact Statement for the Proposed Marathon Palladium Mine (CEAA Registry # 54755)

Thank you for the opportunity to present our closing comments on the Environmental Impact Statement (“EIS”) related to Volumes 1 and 2 of the EIS Addendum for the proposed Marathon palladium mine project “the Project”) by Generation PGM Inc. (“GenPGM”). Environment North bases the following submission of an overall or high level review of the hearing proceedings paying particular attention to process issues rather than specific details from presentations related to:

- Social-Economic Impacts, Lands and Resource Use
- Cumulative Effects, Environmental Monitoring
- Safety, Climate Change
- Decommissioning & Closure Plans

Environment North also endorses the closing remarks submitted by North Watch, Mining Watch Canada and the Citizens for Responsible Industry in Northwestern Ontario.

Environment North would like to take this opportunity to recognize the careful deliberations of the Joint Review Panel (JRP) through their considered questions, clarifications and due diligence throughout the process.

Sincerely,

GVS

Graham Saunders
President, Environment North
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**Closing Comments re: Climate and Socio-Economic Impacts of the
Marathon Palladium Project
Submitted by: Environment North to the Joint Review Panel**

**May 18, 2022
Prepared by: Karen A. Peterson, PhD
Planning, Development & Impact Assessment**

I. COMMENTARY

Environment North's review of the hearing proceedings for the Marathon Palladium Project revealed a consistency amongst the intervenors and government agencies regarding GenPGM's broad-brush approach to the environmental assessment (EA). We noted a general sense of unpreparedness by the proponent GenPGM, as evidenced by the comments and recommendations of intervenors and government representatives as well as from the questions posed by the Joint Review Panel. Vague terminology and methodologies were often used by GenPGM in relation to the sufficiency and completeness of the EIS information presented, such as: *'inadequate baseline data'*, *'inconsistent language'*, *'vague terminology'*, *'limited data'*, *'uncertainty'*, *'incomplete analysis'*, and *'lack of transparency'*. There was also a general appearance of avoidance by GenPGM to answer questions. There was a gap in capacity for follow-up monitoring, no clear predictions related to water quality or the long term health effects of exposure to diesel exhaust and the reluctance of GenPGM to make closure plans public. The economic viability of the project was not clearly identified, nor was there a prediction for the local number of jobs expected to become available. This type of information is critical to not only identify community benefit, but also to identify and address the community service capacity to cope with an influx of mine workers and their families for an extended period of time. GenPGM's project-specific lens paid scant attention to these issues or the cumulative effects of other industrial activity happening in the region.

The hearing proceedings also revealed GenPGM's patterned approach for rating impacts as being 'not significant' with their impact assessment based on their past mining experience, their internal expertise, that common impacts are well understood and utilizing standard mitigation strategies as being sufficient. Environment North contends that significance ratings need to be considered within the local context and through a cumulative lens that considers past, present and future developments, their complexities, interconnections and thresholds that are related to both natural forces as well as human activities and, within the regional landscape. Environment North previously drew attention to GenPGM's constrained approach to climate change as demonstrated by the narrow accounting of greenhouse gas emissions in their documents and

referenced Section 1.2.3 and section 2.4.1 of the EIS Guidelines that require consideration of sustainable development when assessing project alternatives¹.

Potential impacts from mining are high. Toxins from waste rock, for example, can pollute water up and down-stream for centuries. Reclamation is difficult and costly. There is an opportunity an imperative at this EA stage of the GenPGM project to thoroughly evaluate all phases of the project, i.e. the design, construction, operations, and closure plans where the voices of the general public and indigenous peoples can be heard, considered and acted upon. It is also an opportunity to focus on a sustainable future that balances the economy with nature before there are irreversible effects. The success of the EA depends upon the methods and practices of the proponent and the degree to which the public and indigenous peoples are meaningfully involved. Nothing less than a transparent and participatory process can raise awareness about the full scope of issues and cumulative effects in addition to the potential opportunities, otherwise, the process is essentially a superficial scan by industry.

II. RECOMMENDATION

Environment North reiterates that an approval of the EA for the Marathon Palladium Project would be premature and should be delayed until the proponent can provide more rigour to the process. Environment North remains of the view that the JRP cannot find that the project is not likely to cause significant adverse environmental, economic, social and health effects in accordance with the *Canadian Environmental Assessment Act, 2012*.

Environment North strongly encourages the Agency to ensure: (1) there is identification of measures for periodic review and all direct impacts are monitored in a manner offset by agreement with the stakeholders potentially affected; (2) climate change is incorporated utilizing a sustainability lens to fulfill *CEAA 2012*'s promotion of sustainability development and the upholding of international climate commitments; and (3) the public has been involved in a meaningful manner and their values duly incorporated within the decision making process and reflected in the decisions made.

Karen Peterson, PhD

Per
ENVIRONMENT NORTH

¹ IAAC, "Appendix B - EIS Guidelines and Updated Joint Review Panel Terms of Reference" (2021), online: <https://iaac-aeic.gc.ca/050/documents/p54755/139025E.pdf>