

December 7, 2021

Jamie Levy
CEO Generation PGM Inc.
100 King St West
Toronto, ON M5X 1B1

RE: Marathon Palladium Project – Notice of Sufficiency of Information

Dear Mr. Levy,

The Joint Review Panel (the Panel) for the Marathon Palladium Project (the Project) has completed its review of the Environmental Impact Statement Addendum and additional information provided by Generation PGM Inc. (GenPGM) and has also reviewed and considered all the comments and information received to date. The Panel recognizes that differences of views remain between GenPGM and other participants on a number of issues, but the Panel believes that these can be addressed effectively through the hearing process. In cases where these differences reflect an opinion on GenPGM's methodologies and conclusions, the Panel is of the view that the information generated and tested at the public hearing will allow for clarification. Therefore, the Panel has determined that the information provided to date is sufficient to proceed to a public hearing.

However, while the Panel has determined that it has information sufficient to proceed to a public hearing, the Panel will continue to gather the information that it needs to complete its report both before and during the public hearing. The Panel has determined that additional information will be required prior to the hearing, in accordance with sections 44(2) of the *Canadian Environmental Assessment Act, 2012*. The Panel requests that the information identified in Attachment 1 be provided no later than January 14, 2022 to allow participants and the Panel enough time to adequately review the material before the anticipated public hearing start date of February 15, 2022.

The Panel will issue a Notice of Hearing later today. The Panel will provide additional details on the hearing process at a later date. If you have any questions, please contact Jason Patchell, Acting Panel Manager at iaac.marathonminereview-examenminemarathon.aeic@canada.ca.

Sincerely,

<Original signed by>

Debra Sikora,
Panel Chair

Attachment 1 – Information required in advance of the public hearing

Fish and Fish Habitat

On August 20, 2021, the Panel requested that GenPGM provide a fish and fish habitat offsetting plan. In response to the Joint Review Panel's IR 5-15, GenPGM indicated that development of the Project's Fish Habitat Compensation and Offsetting Plan (FHCOP) is ongoing and that additional meetings with Indigenous communities were scheduled to occur in November 2021. GenPGM stated that it will continue to engage all parties and solicit feedback following group meetings to ensure all suggested opportunities are considered and a comprehensive FHCOP is prepared.

On November 24, 2021 DFO wrote to the Panel stating that DFO's ability to provide advice and recommendations would be limited without the submission of the FHCOP. On November 26, 2021, GenPGM wrote to the Panel indicating that the FHCOP could be provided no later than January 14, 2022.

In order to support the Joint Review Panel and others to participate effectively at the public hearing, GenPGM is required to provide a draft of the FHCOP by January 14, 2022.

Water Quality Modelling

On July 30, 2021, the Panel requested that GenPGM provide the inputs necessary to run its MineMod water quality model. In response to the Panels' IR 4-6, GenPGM indicated that key inputs that form the basis of the water quality model are comprised of both the hydrologic inputs and those associated with the geochemical inputs. GenPGM stated that key input parameters are described in the Updated Water Quality Assessment (Appendix D11 of the EIS Addendum [Vol 2]), specifically Sections 2.5, 3.0, and 5.0.

Section 1.5 of the EIS Guidelines require all data and models to be documented such that the analyses are transparent and reproducible. Appendix D11 does not appear to contain all inputs to allow participants to reproduce the outputs of the water quality model.

In order to support the Joint Review Panel and others to participate effectively at the public hearing, GenPGM is required to provide the inputs for the MineMod water quality model by January 14, 2022.

Caribou

On September 13, 2021, the Panel requested that GenPGM provide more detail regarding caribou range connectivity for all phases of the Project, specifically to map and describe the proposed existing corridors for caribou to by-pass or traverse the Project site that would allow intra-range connectivity.

In response to the Panel's IR 6-21, GenPGM provided maps (Figure 10 and Figure 11), but did not describe how the maps were developed or provide a scientific justification to describe how connectivity was assessed.

On December 3, 2021, Environment and Climate Change Canada (ECCC) wrote to the Panel stating that without this information, ECCC cannot provide advice or technical analysis regarding the potential impacts to connectivity within and between ranges.

In order to support the Joint Review Panel and others to participate effectively at the public hearing, GenPGM is required by January 14, 2022 to describe how Figure 10 and Figure 11 in IR 6-21 were developed and provide a scientific justification to describe how connectivity was assessed.

On September 13, 2021, the Panel requested that GenPGM provide additional information regarding sensory disturbance including specific proposed mitigation measures aimed at reducing impacts on Category 1 habitat including measures for all phases of the Project to reduce sensory disturbance, with consideration of appropriate buffer distances.

In response to the Panel's IR 6-23, GenPGM stated that they conclude no negative impacts are anticipated on Category 1 caribou habitat. The rationale provided was the relative lack of Project-related sensory impacts that will reach Highway 17 compared to highway traffic and other anthropogenic disturbance. Further, GenPGM stated there is a lack of documented caribou nursery or winter use in this area which appears to support the lack of caribou use of the area.

On December 3, 2021, ECCC stated that there is insufficient data provided to support this statement and that data should be presented to demonstrate the anticipated sound travel and associated caribou avoidance of the anticipated disturbance, including additional information to support the conclusion that the highway will act as a sound buffer. ECCC stated that without this information, ECCC will not be able to assess the potential impact to caribou due to sensory disturbance.

In order to support the Joint Review Panel and others to participate effectively at the public hearing, GenPGM is required to provide the data to demonstrate the anticipated sound travel and associated caribou avoidance of the anticipated disturbance, and additional information to support the conclusion that the highway will act as a sound buffer by January 14, 2022.

On September 13, 2021, the Panel requested that GenPGM provide information on the sequence and timing of both on-site and off-site reclamation activities.

In response to the Panel's IR 6-21, GenPGM stated that at closure, even with rehabilitation, the SSA will likely be less suitable as habitat for caribou than it is currently, but GenPGM did not provide details regarding progressive rehabilitation measures and the post-closure plan, including the location and timing of activities.

On December 3, 2021 ECCC stated that without this information, ECCC will not be able to evaluate the potential impact to connectivity over the short and long term.

In order to support the Joint Review Panel and others to participate effectively at the public hearing, GenPGM is required to provide details regarding progressive rehabilitation measures and the post-closure plan, including the location and timing of activities by January 14, 2022.