



Indigenous Services Canada
10 Rue Wellington,
Gatineau, Quebec, K1A 0H4

January 25, 2022

Debra Sikora, Panel Chair
Marathon Palladium Project Joint Review Panel
c/o Impact Assessment Agency of Canada
160 Elgin Street, 22nd Floor, Place Bell Canada
Ottawa, Ontario, K1A 0H3

Subject: Participation of Indigenous Services Canada in the Public Hearing for the Marathon Palladium Project

Dear Debra Sikora,

I am writing in response to your correspondence dated December 17th, 2021 where Indigenous Services Canada (ISC) is identified as a Federal Authority with expertise on matters relevant to the Marathon Palladium Project. Your letter requests that ISC participate in the public hearing in accordance with *Section 8.1* of the Amended Joint Review Panel Agreement and *Section 20* of the *Canadian Environmental Assessment Act, 2012 (CEAA, 2012)*. The Panel is also requesting that ISC's submission includes the department's views on the following:

- The likelihood that the Project would cause significant adverse environmental effects;
- The predicted effectiveness of proposed mitigation measures;
- Any additional mitigation measures that might be necessary; and
- The appropriateness of proposed monitoring and follow-up programs.

While ISC has provided feedback on the Marathon Palladium Project, including suggestions to use inclusive language, socio-economic opportunities, as well as the ability of communities to participate in monitoring and follow-up opportunities throughout the various stages of the Project, ISC does not have expertise that could contribute to the Panel's determination of whether the Project is likely to result in significant adverse environmental effects, the appropriateness of the proposed mitigation measures, or the proposed monitoring and follow-up programs. Additionally, ISC does not possess legislative responsibilities in regards to this project and does not have the authority to approve or issue licenses, permits or authorizations in relation to the environmental assessment of this Project.

Given that the comments on the Project provided by ISC have been adequately and sufficiently addressed by the Proponent, ISC will not be participating in the public hearings and will not be providing a written submission to the Panel. ISC will not provide input on the Agency's Crown consultation submission, as advice on Indigenous consultation lies with CIRNAC. Additionally, ISC is aware that the Proponent is currently negotiating Community Benefit Agreements with Indigenous communities that may be affected by the Project. ISC is also aware that these agreements include provisions for employment opportunities for community members, including opportunities for individuals who may be under-represented in the mining sector. ISC is aware that the Proponent is also negotiating provisions for training and skills development for members, including youth training and apprenticeships. ISC acknowledges that these agreements are proprietary and confidential, and that details can not be disclosed as noted by the proponent (See Generation PGM's responses to Information Request (IR7-9 – Training, Employment, and Economic Opportunities) CIAR #950 submitted November 2nd, 2021).

ISC is committed to ongoing collaboration and sharing of its knowledge and expertise pertaining to the delivery of programs and services in First Nations and Inuit communities and will continue to work closely with the Impact Assessment Agency of Canada throughout the remaining stages of the environmental assessment process of this Project.

If you have any questions or require more clarity regarding ISC's role and mandate or the delivery of programs and services in First Nations' communities, please do not hesitate to contact me directly.

Sincerely,

<Original signed by>

Tonina Simeone
Senior Director, Environment Directorate
Indigenous Services Canada / Government of Canada