



Transport Transports  
Canada Canada

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Your file: 54755  
Our file: RDIMS # 18491657

April 11, 2022

Attention: **Ms. Debra Sikora**  
Review Panel Chair  
Marathon Palladium Project  
Impact Assessment Agency of Canada  
[marathonminereview-examenminemarathon@iaac-aeic.gc.ca](mailto:marathonminereview-examenminemarathon@iaac-aeic.gc.ca)

**Subject: Transport Canada's Response to Undertaking #28 to the Joint Review Panel for the Environmental Assessment of the Marathon PGM Mine**

Dear Chairperson and Panel Members,

On March 29<sup>th</sup>, Transport Canada (TC) made a presentation at the Joint Review Panel (JRP) Hearing for the Marathon PGM Mine. During the question and answer session, TC was tasked with developing a response to a question from the JRP. This request was identified as Undertaking #28. As per the *List of Undertakings* (CIAR 1143), the JRP sought input of the following issue:

**Undertaking #28:** "Transport Canada to provide feedback to the Panel on whether there are any implications on the airport from blasting from the Project."

**Transport Canada's Response:**

As part of Transport Canada's mandate to ensure a safe, secure, and environmentally responsible transportation system, the department administers several legislative requirements under *Aeronautics Act* and the associated regulations.

The Marathon Municipal Airport is located south of the Project site and several kilometres southwest of the proposed open pits where blasting would occur. The airport operates as a Registered Aerodrome under the Canadian Aviation Regulations (CARs, Subsection 301).

Aerodrome operators need to be aware of anything in the vicinity that could create a safety risk to flight operations, or operations at the aerodrome. In the case of blasting, an operator should evaluate, as required and in advance of those activities, whether the aerodrome can safely remain

open while blasting is occurring. If blasting will create a hazard to aviation safety at the aerodrome, then the operator should close the aerodrome until the hazard no longer exists. After blasting has occurred the operator should conduct inspections to locate and remove debris (Foreign Object Debris (FOD)) prior to allowing operations to be continued at the aerodrome.

Transport Canada Aeronautical Information Manual – AIR Section 2.4.8 – Blasting Operations<sup>1</sup> notes that:

*“Blasting operations such as those associated with the logging industry, mining, and construction are also a concern when it comes to low flying. The trajectory of debris from blasting varies with the type of explosive, the material being excavated, and any tree canopies, if any.”*

To this end, Transport Canada recommends that Generation PGM review regulatory requirements protecting air traffic safety in consultation with the Marathon Municipal Airport and share blasting notices, schedules and any additional agreed upon communications. If required, either Generation PGM or the Marathon Municipal Airport may request publication of a Notice to Airmen (NOTAM). The NOTAM<sup>2</sup> process is administered by NAV CANADA, a private sector, not-for-profit corporation that provides air navigation services.

Transport Canada hopes the JRP finds this information helpful in the assessment of the Project.

Regards,

<Original signed by>

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David Zeit  
Regional Senior Environmental Supervisor

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<sup>1</sup> <https://tc.canada.ca/en/aviation/publications/transport-canada-aeronautical-information-manual-tc-aim-tp-14371>

<sup>2</sup> A NOTAM is a notice distributed by means of telecommunications containing information concerning the establishment, conditions or change in any aeronautical facility, service, procedure or hazard, the timely knowledge of which is essential to personnel concerned with flight operations. A NOTAM is originated and issued promptly whenever the information to be distributed is of temporary nature and of short duration, or when operationally-significant permanent changes or temporary changes of long duration are made at short notice. The Canadian NOTAM Operating Procedures Manual (<https://www.navcanada.ca/en/cnop-27-jan-2022.pdf>), published by NAV CANADA, outlines the NOTAM process in detail.