

# GENERATIONPGM

April 19, 2022

**Via E-Mail**

Joint Review Panel  
Impact Assessment Agency of Canada  
160 Elgin Street, 22nd Floor  
Ottawa, ON K1A 0H3

Attention: Debra Sikora  
Panel Chair, Marathon Palladium Project

Dear Ms. Sikora:

**Re: Generation PGM (GenPGM)  
Marathon Palladium Project (Project)  
Ministry of the Environment, Conservation and Parks' (MECP) April 7, 2022 letter**

On April 7, 2022, MECP filed a letter (MECP Letter) (CIAR #[1271](#)) with comments on GenPGM March 31, 2022 responses to caribou-related Undertakings #18, #19, #20, and #21 (the Undertakings) (CIAR # [1209](#), [1210](#), [1211](#) and [1212](#)).

The Undertakings were discussed during the Terrestrial Environment Topic-Specific sessions on March 22 and 23, 2022—during which MEPC actively participated. The Undertakings were also outlined in a letter from the Joint Review Panel (Panel) to GenPGM dated March 24, 2022 (CIAR #[1180](#)), in which the Panel did not request comments from MECP or other participants.

After the Undertakings we filed on March 31, 2022, MECP did not present its comments in the MECP Letter during the subsequent public hearing sessions between April 1 and 9, 2022. MECP previously, and more appropriately, took advantage of opportunities to address its questions regarding GenPGM's evidence during the public hearings. For example, MECP raised questions about GenPGM's air quality monitoring tables during the public hearing session on March 28, 2022. At the Panel's request, MECP and GenPGM representatives engaged between March 28 and 31, 2022 and addressed these questions (CIAR #[1222](#)).

The Public Hearing Procedures (CIAR # [956](#)) do not contemplate the opportunity for written submissions between the conclusion of the public hearing sessions on April 9, 2022 and prior to closing remarks. Permitting written submissions during this period would be prejudicial to GenPGM, as it would be required to respond outside of the Panel's process. As a result, in GenPGM's view, the submissions in the MECP Letter are more appropriate for closing remarks.

Based on the above, GenPGM respectfully requests that the Panel instruct MECP and other participants to limit any further written submissions (including the MECP Letter) to closing remarks.

Yours truly,

GENERATION PGM INC.

<Original signed by>

Jeremy Dart  
Environmental Manager