



May 18th, 2022

Ms. Debra Sikora
Panel Chair
Marathon Palladium Project
Joint Review Panel

Re: Parks Canada Closing Remarks for the Marathon Palladium Project

Dear Ms. Sikora,

Thank you for the opportunity to participate throughout the public hearings for the Marathon Palladium Project. Parks Canada participated in the topic-specific hearing sessions related to species at risk, including caribou, on March 22nd and 23rd, 2022, as well as the community sessions on April 4th, 5th and 8th, 2022. Parks Canada's technical experts reviewed Undertakings #18 ([CIAR #1209](#)), #19 ([CIAR #1210](#)), #20 ([CIAR #1211](#)), and #21 ([CIAR #1212](#)) submitted by Generation PGM (GenPGM) that address questions specific to caribou from the Panel as well as Undertaking #31 ([CIAR #1276](#)) that summarizes GenPGM's proposed commitments in relation to valued components, including caribou. Parks Canada's closing remarks are focused on two areas: 1) the updated caribou habitat connectivity analysis (Undertaking #18, [CIAR #1209](#)); and 2) proposed off-setting measures that implicate Pukaskwa National Park (Undertaking #20, [CIAR #1211](#)).

Comments on updated caribou habitat connectivity analysis

As mentioned throughout the environmental assessment process, habitat connectivity beyond the borders of Pukaskwa National Park has implications for caribou conservation and recovery within the park. Parks Canada's perspective is that the conclusions of GenPGM continue to underestimate the potential risk to caribou habitat connectivity. Specifically, the assessment does not consider the spatial extent of caribou avoidance behaviour in models and lacks data-substantiated movement corridors around the project site. In addition, the assessment indicates that the project footprint during operations will have a high resistance value, which is likely to persist, to a lesser extent, for at least 50 years post-closure (Undertaking #18 [[CIAR #1209](#)]). Parks Canada continues to support Environment and Climate Change Canada's conclusions and recommendations related to caribou habitat connectivity, as the lead federal department for caribou within the project area beyond the borders of Pukaskwa National Park.

Comments on proposed off-setting measures

Parks Canada notes that within *Undertaking #20 Caribou Offset Measures Under Consideration* ([CIAR #1211](#)), GenPGM mentions Pukaskwa National Park with reference to proposed strategies to augment the caribou population within the mainland portion of the Coastal Range. Specifically, Pukaskwa National Park is mentioned as a potential mainland area for population management actions (i.e. to translocate caribou (Undertaking #20 [[CIAR #1211](#)], option #2) and as a potential location for maternal penning (Undertaking #20 [[CIAR #1211](#)], option #3)).

As mentioned by Parks Canada during the public hearing on March 23rd, 2022, Parks Canada has spent considerable effort over the last decade assessing the feasibility of caribou translocations into Pukaskwa



National Park. It remains Parks Canada's perspective that habitat connectivity and restoration outside the park remains a key limiting factor that needs to be addressed in order to move to a position where translocation of caribou into Pukaskwa National Park could be reconsidered.

Until a long-term habitat management approach that promotes improved connectivity for this range has been developed with a clear implementation plan, any population management actions undertaken in the range will likely only be temporarily successful. Furthermore, population management activities would have high socio-economic implications and would require thorough consideration, collaboration and consultation with all relevant partners and stakeholders. As such, it is premature for Parks Canada to comment on or consider specific strategies related to population management proposed by GenPGM at this time.

Parks Canada remains committed to continued work with federal and provincial departments, Indigenous communities, and other stakeholders on caribou conservation and recovery measures throughout the Coastal Range and within Pukaskwa National Park.

Thank you for the opportunity to provide concluding remarks.

Sincerely,

<Original signed by>

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