

GENERATIONPGM

August 24, 2021

Marathon Joint Review Panel Secretariat
160 Elgin Street, 22nd Floor
Ottawa, ON K1A 0H3

Attention: Cindy Parker, Co-Panel Manager
Marathon Palladium Project

Dear Ms. Parker:

**Re: Generation PGM Inc. (“GenPGM”) Marathon Palladium Project (“Project”)
Request for Outstanding Information Requests**

We are writing to request information regarding the timeline for provision of outstanding information requests (“IR”) with respect to the Project.

Public Comment Period and Environmental Impact Statement Sufficiency

Following Generation’s submission of the Environmental Impact Statement (“EIS”) Addendum, the Joint Review Panel (“JRP”) invited public comments on the EIS Addendum from interested parties until June 27, 2021 (Reference Nos. [729](#), [742](#) and [743](#)). The public comment process period was later extended by the JRP by one month and closed on July 26, 2021 (Reference No. [755](#)).

The JRP Amended Terms of Reference dated February 3, 2021 (Reference No. [730](#)) (“**Terms of Reference**”) sets out two process steps following the close of the public comment period:

1. Section 3.4 of the Terms of Reference state that within thirty (30) days of the completion of the public review of the EIS Addendum, the JRP will determine if the EIS and the EIS Addendum contains sufficient information to proceed to a public hearing; and,
2. If the JRP determines that the EIS and EIS Addendum are not sufficient to proceed to a public hearing, section 3.5 of the Terms of Reference requires that the JRP issue a deficiency statement requesting additional information or studies.

On July 30, 2021, GenPGM received a fourth IR (Reference No. [913](#)) (“IR4”), which states that the EIS Addendum was not sufficient to proceed to a public hearing. IR4 noted that additional IRs may be issued to GenPGM “in the coming weeks”. In accordance with sections 3.4 and 3.5 of the Terms of Reference and IR4, GenPGM understood that it would receive outstanding IRs from the JRP within 30 days (approximately 4 weeks).

Information Requests

The table below summarizes the IRs received and GenPGM’s responses around the close of the public comment period on July 26, 2021:

IR Round	IR Issuance Date	No. of IRs	GenPGM IR Response Date
IR 3 (Reference No. 875)	July 13, 2021	3	July 30, 2021 (Reference No. 912)
IR 4 (Reference No. 913)	July 30, 2021	7	August 18, 2021 (Reference No. 917)
IR 5 (Reference No. 921)	August 20, 2021	18	Forthcoming

Requested Relief

Section 12.9 of the Terms of Reference states that the JRP will have due regard to economy and efficiency when incurring costs during the conduct of the environmental assessment. A purpose stated in section 4(1)(f) of the *Canadian Environmental Assessment Act, 2012* (“**CEAA 2012**”) is to ensure that the Project’s environmental assessment is completed in a timely manner.

To date, GenPGM has received approximately 28 information requests in three filings over six weeks. Respectfully, GenPGM is prejudiced when it must incur costs to re-engage technical experts with respect to separate information requests on related topics that are issued separately over several weeks. The JRP and participants must also cross-reference GenPGM’s IR responses between numerous documents filed over several weeks. In GenPGM’s view, fairness and efficiency requires that all participants have the ability to review GenPGM’s final and comprehensive information request responses on all topics as soon as reasonably possible.

In GenPGM’s view, CEAA 2012, the JRP’s Terms of Reference and IR4 reasonably require that the JRP identify any deficiencies and additional information or studies in the EIS and the EIS Addendum in a timely and efficient manner, and within 30 days of the July 26, 2021 close of the public comment period (i.e. by August 25, 2021). As a result, GenPGM respectfully requests that the JRP issue any new additional information requests by August 25, 2021.

If you have any questions or concerns, please do not hesitate to contact the undersigned.

Sincerely,

GENERATION PGM INC.

<Original signed by>

Jamie Levy
 President, Chief Executive Officer and Director