



Joint Review Panel for the Marathon Palladium Project

Debra Sikora – Chair, Joint Review Panel

c/o Impact Assessment Agency of Canada

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December 21, 2021

**Subject: Marathon Palladium Project – Requesting additional time for Environment and Climate Change Canada’s Written Submission on the topic of Caribou**

Dear Ms. Sikora,

Thank you for the invitation to participate in the Public Hearing for the Marathon Palladium Project. Environment and Climate Change Canada (ECCC) will respond to the invitation in a separate letter. The purpose of this letter is to request additional time for ECCC to submit our written submission on the topic of caribou and the terrestrial environment. ECCC requests an extension to be able to provide this information to the Panel 30 calendar days following the submission of the additional caribou information by the Proponent.

The Joint Review Panel (JRP) has requested additional caribou information from Generation PGM Inc. (the Proponent) as specified in the [Notice of Sufficiency of Information](#) (CIAR#955). ECCC wishes to thank the JRP for requesting this additional important information and understands that the Proponent’s response is due by January 14, 2022. However, since the written submission from ECCC must be submitted to the Panel January 31, ECCC will have only 17 calendar days to review the new information and complete our written submission on this topic.

ECCC wishes to bring to your attention our concerns with this timeline. The review of new information and preparation of our submission for the Panel on the Proponent’s assessment of project effects to caribou within the timeline prescribed in the public hearing procedures will be very challenging. In order to complete our assessment ECCC must also consult with Parks Canada and Natural Resources Canada, our federal partners who also have caribou expertise, which adds to the time constraints. An extension would allow ECCC to analyse the Proponent’s additional information and provide the best advice possible to the JRP with respect to the effects assessment and adequacy of mitigation measures, as well as minimizing the likelihood of new information or analysis being presented during the hearing.

ECCC intends to provide the written submission relating to our other mandate areas to the Panel by the requested deadline of January 31, 2022.

Thank you for your consideration. If you have any questions with the content of this letter, please contact Rob Clavering by email at <email address removed>.



Yours sincerely,

<Original signed by>

Wes Plant  
Manager – Environmental Assessment Section  
Environment and Climate Change Canada

Cc:

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