

Joint Review Panel for the Marathon Palladium Project
Debra Sikora – Chair, Joint Review Panel
c/o Impact Assessment Agency of Canada
160 Elgin Street, 22nd Floor
Ottawa, ON, K1A 0H3
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February 10, 2022

Subject: Participation of Environment and Climate Change Canada in the Public Hearing for the Marathon Palladium Project

Dear Ms. Sikora,

Thank you for your letter of December 17, 2021 inviting Environment and Climate Change Canada (ECCC) to provide a technical written submission to the Joint Review Panel (the Panel) for the Marathon Palladium Project (the Project), and to participate in the public hearings. ECCC has also received notification of the change in date for the start of the hearings now on March 14, 2022. ECCC will participate in the public hearing in accordance with section 8.2 of the Amended Joint Review Panel Agreement and section 20 of the *Canadian Environmental Assessment Act, 2012*. ECCC will provide a technical written submission, make oral presentations and participate in the public hearing.

ECCC's technical written submission on the potential environmental effects of the project will include recommendations to the Panel on subjects within the Department's mandate, including: air quality, water quality and quantity, biodiversity, including caribou, other species at risk and migratory birds, greenhouse gas emissions, climate change, and effects from accidents and malfunctions. ECCC will also provide an analysis of the methodology used by Generation PGM Inc. (GenPGM) to assess mercury and the effects of mercury speciation on bioavailability. ECCC does not have expertise in the area of metal speciation treatment or cumulative effects in the region, including impacts from forest harvesting.

Within the areas of expertise listed above, ECCC will provide scientific and technical information and knowledge on GenPGM's characterization of environmental effects, the proposed mitigation measures, and the monitoring and follow-up programs. ECCC will also provide recommendations to the Panel on any additional measures needed to mitigate potential environmental effects. ECCC intends to present orally at the hearing on the topics of: the terrestrial environment, the aquatic environment and Woodland Caribou. ECCC will not require the services of a translator for participating in the hearing. Lastly, ECCC does not intend to be represented by legal counsel at the hearing.



If you have any questions with the content of this letter, please contact Rob Clavering by email at ^{<email address removed>}.

Sincerely,

<Original signed by>

Mary Taylor
Director General
Environmental Protection Operations
Environment and Climate Change Canada

Cc:
Wes Plant, Environment and Climate Change Canada
Dale Gration, Environment and Climate Change Canada
Rob Clavering, Environment and Climate Change Canada
Joseph Ronzio, Impact Assessment Agency of Canada