
December 18th, 2013

Ms Lesley Griffiths, Joint Review Panel Chair
Marathon Platinum Group Metals and Copper Mine Project
Canadian Environmental Assessment Agency
160 Elgin Street, Place Bell Canada
Ottawa, Ontario K1A 0H3

Dear Ms. Griffiths:

**RE. Notice Period and Announced Timeline for Public Hearing
Proposed Marathon Platinum Group Metals & Copper Mine Project**

Congratulations on your appointment as the new Chair of the Joint Review Panel established to review the proposed Marathon Platinum Group Metals and Copper Mine Project.

We received yesterday's Notice of the Public Hearing with concern.

In our view, the timelines and timing of the hearing as outlined in the Notice of Public Hearing on December 17th are unreasonable for a number of reasons, including:

- The time allowed to register for the hearing (by January 7) is extremely short, particularly given that this period includes the Christmas/New Year holiday season. Many offices are closed during the last two weeks of December and until the first business days in the new year, i.e. for the majority of the time provided for deciding on whether to register to participate in the hearing. Communicating with potentially interested members of the public during the holiday season to make them aware of their opportunities to participate will be more difficult and potentially less effective than during any other time of the year. The problem is the same for those organizations where members need to confer with each other to decide whether or how the organization will participate in the hearings.
- The time allowed to prepare and file written submissions is extremely short, particularly given that this period includes the Christmas/New Year holiday season; for example, technical experts may not be available until into the new year, given that the holiday season is upon us and that the experts may already be in the midst of other important project assignments.
- For those who are preparing written submissions on a volunteer basis, this timeline may act as a serious disincentive, given that making full use of the limited time available would require those individuals to forego the holiday season in favour of preparing written submissions over the holiday season in order to meet the January 20 deadline
- Requiring that written submissions be filed by January 20th allows only ten days between receipt of Stillwater's responses to the Additional Information Requests and the filing deadline; this assumes that Stillwater actually provides the response by January 10th and that the responses are posted on the Public Registry the same day they are received. The additional information requests relate to very important issues. Therefore, the answers to these information requests



may have a substantial impact on the public's, our experts' and our organizations' conclusions. In addition, once their submissions have been drafted, organizations participating in the hearings need time to go through their revision and approvals processes. It is unrealistic to think that all of this can be achieved in ten days.

- Conducting the hearing in February on the north shore of Lake Superior creates strong possibilities, if not likelihoods, of delays and cancellations during travel for those outside of the immediate area; these same conditions are likely to cause delays and inconveniences at a local level, and potentially cancellation of hearing sessions. This past month the Trans-Canada Highway north of Sault Ste. Marie was closed numerous times due to heavy snow; these weather conditions routinely result in road closures and flight cancellations around Lake Superior during the winter months.

We consider the timelines outlined in the Notice issued December 17th to be unfair and unreasonable. At a minimum, the Notice for the Public Hearing should be withdrawn, and not re-issued until the final responses to the Additional Information Requests have been received.

Thank you for your consideration of these concerns. We look forward to receiving your positive and timely response.

Sincerely,

<original signed by>

Charlene Rogers
Environment North

<original signed by>

Ramsey Hart
MiningWatch Canada

<original signed by>

John Jackson
Lake Superior Binational Forum

<original signed by>

Brennain Lloyd
Northwatch

cc. Dr. Phil Byers, Panel Member
Dr. David Pearson, Panel Member

Cindy Parker, Panel Co-Manager, Canada
Jeff Sewell, Panel Co-Manager, Ontario

Tabatha LeBlanc, Environmental Manager, Stillwater Canada Inc.



Teri Burgess, Citizens for Responsible Industry in Northern Ontario

Juli Boan, Ontario Nature

Brad Maggrah, President, Ontario Coalition of Aboriginal People

Cam Burgess, Region 2 PCMO Councilor, Metis Nation of Ontario

Donelda DeLaRonde, Executive Director, Red Sky Metis Independent First nation

Jamie Michano, Director of Lands and Resources, Ojibways of Pic River First Nation

Theresa Bananish, Bananish Law, Pic Mobert First Nation

John Szura, CEO, Pays Plat First Nation

Mike Ripley, Chippewa Ottawa Resource Authority

