

# NORTHWATCH

December 4<sup>th</sup>, 2013

Marathon Platinum Group Metals and Copper Mine Project  
Canadian Environmental Assessment Agency  
160 Elgin Street, 22nd floor, Place Bell Canada  
Ottawa ON K1A 0H3

Sent by Email: [MarathonMine.Review@ceaa-acee.gc.ca](mailto:MarathonMine.Review@ceaa-acee.gc.ca)

Attention: Cindy Parker, Panel Manager

Dear Ms. Parker:

Re. **Northwatch Comments on the Information Provided in Response to Supplemental Information Requests of August 30, 2013 Panel Review of the Marathon Mine Project**

On November 20<sup>th</sup>, the Joint Review Panel announced that Stillwater Canada Inc. had submitted the final response to the Supplementary Information Requests issued by the Joint Review Panel on August 30, 2013. At the same time, the Marathon Mine Joint Review Panel announced a 15 day public review and comment period on Stillwater Canada Inc.'s (SCI) responses to SIRs.

We offer the following brief comments, based on our review of the SIR responses:

- The IR responses indicates that the Stillwater proposal is still not mature; for example, in response to SIR-1, alternatives for rail loading under consideration has gone from 7 to 8 to 4 since filing of EIS, but only minimal information has been provided about the alternatives, in particular the more recently added alternatives
- The acknowledgement included in the SIR response #1 that identified alternatives were simply a place holder indicates that the alternatives assessment approach was inadequate from inception
- SIR-1 directs Stillwater to Describe the five alternative rail load-out locations presented in the response to IR 5.1, including impulsive sound emission levels ; the SIR-1 response provides minimal information with respect to impulsive sound emission levels, but more significantly identifies Marathon 3 a newly introduced alternatives as the preferred alternative

- Additional detail and information is required about both the alternatives analysis and in particular about the proponents newly selected preferred alternative for a load-out location
- It appears that Stillwater is proposing that their AMD estimates be deferred until during operations; AMD potential is potentially the most significant environmental issue in a mine proposal, and a sound understanding of the AMD potential is required prior to approval
- Stillwater should be required to describe in more detail the basis for their estimate of the total amount of Type 2 rock
- In response to SIR-3, Stillwater states that various inventories have been updated since the EIS; a revised and updated EIS should be filed, rather than allowing Stillwater to provide updates on a piecemeal bases or by reference
- Stillwater states that their responses to SIR-4 were reviewed with NRCan at a meeting on 29 August 2013 in Ottawa prior to the Panel issuing this SIR; no meeting record is posted on the public registry

As was the case with the EIS and as outlined in our submission on the conformity of the EIS with the EIS guidelines, our assessment remains that while Stillwater Canada Inc. has provided a very large volume of information, there are numerous issues with the quality, adequacy and completeness of the information provided. At this point in the review, we would welcome a decision by the Joint Review Panel to require Stillwater to revise and refile their Environmental Impact Statement. At minimum, following response to any additional information requests the Joint Review Panel might issue following their review of Stillwater's most recent responses, Stillwater should be required to generate a concordance table, identifying clearly how the information providing in the EIS, the IR responses, and the SIR responses correspond to the EIS guidelines.

Thank you for considering our comments.

Sincerely,

*ORIGINAL SIGNED*

Brennain Lloyd  
Northwatch