



P.O. Box 800  
Suite 701, 34 Cumberland St. N.  
Thunder Bay, ON Canada  
P7C 5K4  
Phone: 807.625.3960  
Toll Free: 1.800.668.9360

October 23, 2020

Impact Assessment Agency of Canada  
([iaac.marathonminereview-examenminemarathon.aeic@canada.ca](mailto:iaac.marathonminereview-examenminemarathon.aeic@canada.ca))

**RE: Generation PGM Inc., Marathon Palladium Project  
Comments on Draft Amended Agreement for Joint Review Panel for Marathon Palladium Project  
Environmental Assessment**

It is with immediate concern that I submit these comments to The Impact Assessment Agency of Canada (IAAC) and the Government of Ontario regarding the abovementioned Environmental Assessment (EA) Draft Terms of Reference (TOR). Of specific concern is the fact that the Minister of the Environment and Climate Change has extended the timeline for the submission of the Joint Review Panel (JRP) report by 90 days, for the Marathon Palladium Project, to 271 days.

The Marathon Palladium Project is Canada's largest undeveloped palladium deposit, at over 8 million ounces of contained palladium, a metal used as an auto catalyst for clean air. The project will have a positive impact on Thunder Bay, Marathon and the north shore indigenous communities by providing 400 construction jobs over 2 years, and 365 operational jobs over 14 years. In addition, the 400 plus mine service and supply companies located in Thunder Bay and Northwestern Ontario would benefit from construction and operational work.

The Marathon Palladium Project would support economic recovery from the COVID19 pandemic in a timely fashion, as the release of the Final Bankable Feasibility Study is imminent (early 2021). Federal and Provincial leaders continue to indicate the need to prioritize resource and infrastructure development to stimulate the economy; this project speaks directly to that messaging and could be a timely example of senior government delivering on these priorities.

Specifically the announcement to add 90 days (therefore 271 days total) to the panel timelines may be premature considering the JRP has not been struck. In fact, Panel review timelines need to be reduced to more efficient timelines, as in the original 181 day format (or less) as time is of the essence in economic recovery as we collectively send signals that Ontario is open for business!

It can be argued that the Marathon Palladium Project has previously achieved a relatively high degree of sufficiency based on the extensive and robust past work already completed and given the project remains essentially unchanged, as a shovel ready project. It is my understanding that Generation PGM and its predecessors (Marathon PGM and Stillwater Canada) have invested over 13 years in baseline data collection; Environmental Assessment work and Joint Review Panel process preparation historically...and that the project description is generally consistent with those efforts and previously completed government agency technical reviews.

In addition, the Terms of Reference "Days proposed", as a suggestion, could be flexible and read (as an example) "up to 45 days or less" to provide greater certainty for planning to the proponent and the financial investment community around the project.

Timing of milestones for decisions is another important consideration. If the 271 day timeline equates to a Provincial Minister's decision in approximately June 2022, and that ends up being somewhat synchronous with a provincial election, more delays could be in play, negatively impacting a world class mine development and our north shore economies.

October 23, 2020

Page 2

The Rotman School, University of Toronto, has projected financial analysis for a typical open pit mine/mill of this size in Ontario, as contributing \$301M in GDP annually to Ontario, and \$95M in taxes/revenue annually to Canada, once in production.

I would strongly suggest that the 90 extension be reconsidered and the 181 day JRP timeline be adopted and rigidly maintained, particularly given the familiarity both senior levels of government already have with this long-standing and well developed project. Furthermore, should the Ministerial decisions on this project be delayed due to falling within the election blackout period(s); it would be a political travesty impacting the economies of Marathon, Thunder Bay and Ontario. Instead, I urge the IAAC and JRP to strive to make this review a “gold-star” example of government, regulators and an independent panel working efficiently and expediently to approve a project that will benefit the region, the Province and Canada for years to come at a time when it is direly needed.

Sincerely,

<Original signed by>

Eric Zakrewski, CEO,  
Thunder Bay Community Economic  
Development Commission

cc     Minister Patty Hajdu  
          Honorable Marcus Powlowski  
          Minister O’Regan  
          Minister Wilkinson  
          Minister Rickford  
          Minister Yurek  
          Minister Phillips  
          MPP Michael Gravelle  
          MPP Judith Monteith-Farrell  
          Chris Hodgson Pres. OMA  
          Jamie Levy, President, Generation Mining  
          Rick Dumas, Mayor, Town of Marathon