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OFFICE OF THE MAYOR

File No. 3-75

SENT VIA EMAIL: iaac.marathonminereview-examenminemarathon.aeic@canada.ca

June 2, 2021

Impact Assessment Agency of Canada
Joint Review Panel
Marathon Palladium Project

The Town of Marathon (“the Town”) is an engaged participant in the Marathon Palladium Project (“the Project”) Joint Review Panel process and actively reviews all materials and provides input as it relates to the project review process.

The Town provides the following as part of the current open, public comment period:

- ***The Marathon Palladium Project is being developed with local community and Indigenous involvement at every step including providing ongoing input regarding the site’s operations and environmental plans over its useful life.***
 - Generation PGM Inc. and its predecessor have been consulting through meaningful engagement with the Town of Marathon, sixteen (16) Indigenous communities and other local municipalities, as well as the City of Thunder Bay since the outset of the Project.
 - Despite the COVID pandemic, Generation PGM Inc. has been a collaborative and respectful project developer with the Town of Marathon, working to accommodate our concerns and interests through this process on a timely basis.
 - The Impact Assessment Agency of Canada (IAAC) should clearly focus on the concerns of those communities that are truly invested in and impacted by the Project. The comments as stated by these communities should carry more value than a generalized public comment that is ultimately not affected by the locality of the Project and its impacts.
- ***The Marathon Palladium Project would bring hundreds of long-term, stable jobs to Northern Ontario as part of the COVID-19 recovery.***
 - The Project will create close to 400 permanent jobs in a region that has struggled economically in the last decade. Job creation will extend far beyond just mining extraction and processing jobs and include: construction, environmental management and sciences, transportation, energy, equipment services, management and consulting, food services, and accommodations.

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- The Project will be an asset in attracting and retaining a younger workforce to communities with an aging demographic. This will contribute to a local economic multiplier effect as well as numerous socio-economic benefits to the local communities impacted by the Project.
 - The Project will represent a significant economic opportunity for the region and local communities, business, and industry; while making a meaningful contribution to Canada's low-carbon future. According to the Ontario Mining Association, ninety (90) percent of Ontario's mining gross domestic product (GDP) stays in Ontario.
- ***Government approval timelines do not consider the costs of delay that will affect the local communities. The longer Government processes and reviews take; the less likelihood that the Project gets built, which equals a zero-sum gain for local communities.***
- Federal approval processes are taking so long with no fundamental reasoning for the delays which puts local communities at risk of missing out on the commodity boom that will follow from the pandemic. Requesting additional information or studies that stops the review process which provides no material value to the assessment of the Project and does not serve to further the public interest should not be allowable.
 - The Marathon Palladium Project does not belong in a joint review process as this is an "in Ontario" project – the Federal government should recognize this and clearly commit to expediting the necessary project approvals.
 - The timelines of the joint approval process present a serious risk to project viability and need to be prioritized versus the greater public good. Governments need to recognize the economic and employment benefits of this Project which have the ability to stabilize local community economies for decades.

In closing, the Town of Marathon is a strong proponent of the development of the Marathon Palladium Project. It is our view; based on our consultation and ongoing discussions with Generation PGM Inc., that the joint panel review process should proceed in a manner that is both expeditious and responsible. There is currently nothing of major concern that should delay the review process. As one of two local communities that is directly affected by this project through its geographic proximity, the Town will continue to advocate for a timely process as our ultimate responsibility is to support projects and endeavors that are in the best interest of our Marathon residents.

Sincerely,

THE TOWN OF MARATHON

<Original signed by>

Mayor Rick Dumas
On behalf of Marathon Town Council

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