

July 22, 2021

Debra Sikora,
Panel Chair
Joint Review Panel
Marathon Palladium Project

Re: Invitation to participate in the public comment period on the Environmental Impact Statement Addendum for the proposed Marathon Palladium Project

Dear Ms. Sikora:

On April 20, 2021, the Joint Review Panel invited the then Ministry of Natural Resources and Forestry, currently a section of the Ministry of Northern Development, Mines, Natural Resources and Forestry (NDMNRF) to review the technical merit of the information contained in Generation PGM Inc.'s Environmental Impact Statement (EIS) Addendum and supporting documents.

The NDMNRF appreciates the opportunity to review the EIS Addendum and supporting materials, including the responses to Panel Information Requests #1 and #2 and provide the attached table of comments where we feel that there is insufficient information provided in relation to our mandate and legislative interests. In addition to the attached table, please note that NDMNRF has a coordinated comment with the Ministry of Environment, Conservation and Parks – Species at Risk Branch (MECP-SARB) related to woodland caribou. It is expected that the MECP-SARB will submit these combined comments.

In the attached table of comments, the NDMNRF has used the word required when the information is necessary for NDMNRF to carry out an appropriate review based on its legislative and regulatory mandate, or when it is required to satisfy its environmental assessment requirements and obligations to consult with Indigenous communities in connection with likely authorizations that will be required in connection with the proposed project. If this required information is not included in the EIS, then NDMNRF may require that additional work be done (after the impact assessment process) by the company and the Ministry to satisfy its own environmental assessment and consultation obligations in connection with specific authorizations.

Normally, NDMNRF would provide comments related to Indigenous interests and rights as they related to our mandated and legislative interests. However, it is understood that the Crown Consultation Team is coordinating the consultation activities, to the extent possible, to make best use of the environmental assessment process for the proposed Marathon Palladium Mine project, and in order to assist the Crown in fulfilling its duty to consult with Indigenous peoples.

NDMNRF will look to the consultation record submitted during the EIS process when assessing our consultation obligations with respect to our permits and authorizations that may be issued to implement this project. NDMNRF may also request any additional information that may have resulted from the communities' technical review of the EIS documentation (eg comments submitted by Indigenous communities, additional consultation that may have occurred as a result, etc). Should the subject of a required authorization and related information (eg off-set measures for fisheries, mitigation efforts for woodland caribou, access upgrades etc) not be made available as part of the EIS, there may be a requirement for additional consultation with Indigenous communities whose asserted or established Aboriginal or treaty rights may be adversely impacted at a later phase of the project.

NDMNRF – Natural Resources and Forestry section, would like to thank the Joint Review Panel for considering our comments appended to this letter. Should you have questions or concerns related to the appended comments, please contact James Bennitt, District Operations Supervisor, at <contact information removed>

Sincerely,

Chris Magee
Nipigon District Manager

Attached: NDMNRF Marathon PGM Comments

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Organization (if applicable):

Ministry of Northern Development, Mines, Natural Resources and Forestry – formerly the Ministry of Natural Resources and Forestry.

General Comments:

The following are comments in relation to the 2021 EIS Addendum, updated 2020 Baseline documents, and / or comments carried forward from the original 2012 EIS.

The Ministry of Northern Development, Mines, Natural Resources and Forestry (NDMNR) has used the word **required** when the information is necessary for NDMNR to carry out an appropriate review based on its legislative and regulatory mandate, or when it is required to satisfy its environmental assessment requirements and obligations to consult with Indigenous communities in connection with likely authorizations that will be required in connection with the proposed project. If this required information is not included in the EIS, then NDMNR may require that additional work be done (after the impact assessment process) by the company and the Ministry to satisfy its own environmental assessment and consultation obligations in connection with specific authorizations.

Date: July 22, 2021

Information being requested

NDMNR	Information Source <i>Section or page # of EIS 2012 EIS Addendum 2021, previous Information Requests, etc.)</i>	Information for the Joint Review Panel to consider when deciding whether additional information is needed	Rationale information is needed or question Panel should ask from proponent
NDMNR#1	Section 1.3.4 Page 1.19 Table 1.3-3	There is out-dated / missing information in this Table: As of April 2019, the responsible authority for the Endangered Species Act transferred from the Ministry of Natural Resources and Forestry (MNR) to the Ministry of Environment, Conservation and Parks (MECP). Please update this information.	NDMNR requests GenPGM update the table with current information.

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		<p>If they have serious concerns about their ability to access the lake by hiking or snow mobile, then it is recommended that GenPGM work with stakeholders and NDMNRF to develop improved access for Bamooos Lake.</p>	<p>mitigation may trigger Environmental Assessment Act (EA Act) requirements.</p> <p>To the extent that information about upgrades to the trail or new access is not made available as part of the EIS, if additional authorizations are required from NDMNRF to authorize the contemplated upgrades and construction, NDMNRF may need to undertake additional consultation with Indigenous communities whose asserted or established Aboriginal or treaty rights may be adversely impacted by the upgrades and new construction.</p>
<p>NDMNRF#3</p>	<p>Section 6.2.9.6.1 Page 6.428</p> <p>Page 6.433 and Section 1.5.4.11 page 1.55</p>	<p><i>“Access to the project site is currently provided by the Camp 19 road. The existing road runs east towards the Pic River before turning north along the river to the project site (approximately 8 km). the existing road will be utilized from its junction with Hwy 17 for approx. 2.2 km, where at this point a new road running north will be constructed to the future plant site.”</i></p> <p><i>“Access to the Project is currently provided by the Camp 19 road. The existing road will be upgraded (ie brushing, installation / upgrades to culverts, and construction of an appropriate gravel roadbed) and utilized from its junction with Highway 17 to a new road running north that will be constructed to access the project site.”</i></p> <p>There is currently insufficient information related to the proposed upgrades to the Camp 19 road in the EIS, including upgrades to the existing water crossing. Road</p>	<p>NDMNRF requires GenPGM include the entirety (from its junction with Hwy 17) of the Camp 19 road and associated infrastructure to be upgraded / maintained by GenPGM in the Site Study Area (SSA) and evaluated in the EIS.</p> <p>Upgrades to this road or associated infrastructure may trigger additional EA Act requirements, and authorizations from NDMNRF.</p>

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		<p>and / or water crossing upgrades may trigger the need for authorizations from NDMNRF under the Public Lands Act and / or Lakes and Rivers Improvement Act. The applicable legislation varies depending upon the land tenure where these components are situated.</p> <p>The EIS should be updated to include the entirety of Camp 19 road identified for upgrades and / or maintenance for this project.</p>	
NDMNRF#4	Section 1.5.4.11 Page 1.56	<p><i>“A new section of road will be developed that links Camp 19 road to the mine site, which follows a revised alignment from the one proposed in the original EIS (2012).”</i></p> <p>As identified in the EIS Addendum, there is a new proposed / preferred access road to the project site. It is however obvious in satellite imagery that the 2012 preferred access corridor for the 2012 EIS had been constructed pre-submission of the EIS Addendum. The intent (including decommissioning / rehabilitation) for that cleared road corridor should be included in the EIS Addendum.</p>	NDMNRF requires GenPGM identify in the EIS Addendum their intentions (including decommissioning and rehabilitation) for the cleared/constructed 2012 EIS preferred access road.
NDMNRF#5	6.2.9.6.3 Page 6.437 and page 6.440	<p><i>“GenPGM will engage with the Town of Marathon and provincial Crown lands permit holders to address potential disturbance to or access restrictions to municipal and Crown land areas”</i></p> <p><i>“Given that the project results in a relatively small change in sound levels to nearby landowners and resource users, and the sound pressure levels are well below regulatory threshold, with the implementation of mitigation</i></p>	<p>NDMNRF requires GenPGM set out a detailed plan to engage with Crown Land Permit Holders and other stakeholders who may be impacted by the project.</p> <p>NDMNRF requires GenPGM to structure the timeline so that Crown Land Permit Holders and other stakeholders are consulted during</p>

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	Table 8.1: Updated Table of Commitments – Socio-Economic Conditions (Page 8.22)	<p><i>measures...effects as a result of sensory disturbance are therefore anticipated to be low in magnitude".</i></p> <p>GenPGM outlines that they will reach out to Crown Lands Permit holders to address potential disturbances and/or access restrictions, however an adequate timeline for this is not given. The timing is listed as "<i>Throughout mine life as appropriate</i>". The Crown Lands permit holders and stakeholders should be engaged ahead of time.</p> <p>There is insufficient information related to the assessments and mitigations taken, how will they be applied and how will they be communicated to the existing Crown Lands Permit Holders.</p> <p>A few of NDMNRF permit holders and stakeholders include: the Land Use Permit holder on Hare Lake; Resource based tourism outfitters with structures located within 10km of the project; trapline TR023 is a regular registered licence with 19ha within the SSA; bait harvester (NI3502) use of Claw Lake; the Sustainable Forest Licence holder; and, Aggregate Pit operators.</p>	the EIS as additional mitigation efforts may need to be explored which could trigger additional EA Act requirements
NDMNRF#6	<p>Section 6.2.6.1.2 Page 6.242</p> <p>Section 6.2.6.6.1 Page 6.260</p>	<p>The determination of significance from the original EIS identified that "<i>approximately 70% of the forest to be cleared for site infrastructure was proposed to be replanted, resulting in a net loss of 200ha of forest</i>".</p> <p><i>"Rehabilitation will include Sowing graminoid and herbaceous seed-mixes. Areas of the SSA conducive to tree and shrub growth will be left to naturally revegetate through the natural recruitment of adjacent tree and shrubs in the surrounding landscape."</i></p>	<p>NDMNRF requires GenPGM amend these sections as they should be consistent and to provide the necessary information to assess the impacts of proposed tree clearing and proposed rehabilitation.</p> <p>The NDMNRF recognizes that there are project components that cannot be regenerated to forest eg tailings facility, mine rock piles, and the open pits. NDMNRF requires GenPGM to</p>

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NDMNRF#8	<p>1.5.4.12 Page 1.56 And Figure 1.6-1</p> <p>And Chapter 3 (alternative assessment)</p>	<p><i>“The electrical power for the mine site is planned to be provided by a new 2.2km 115 kV overhead transmission line connection to the existing Terrace Bay – Manitouwadge transmission line...that runs north of the Project.”</i></p> <p>There is insufficient information provided related to why the northerly connection to the transmission corridor is the preferred option versus aligning with proposed infrastructure. It does not appear that consideration for tying into this system even considered alternate location eg where the proposed access road and effluent pipeline intersect the transmission line at Hare Lake. No rationale has been provided as to why cutting a new line / creating a 2.2 km x 30 m ROW to the north is required or why aligning with proposed infrastructure disturbances was not considered.</p>	<p>NDMNRF requests GenPGM re-evaluate where the transmission corridor is accessed for their project.</p>
NDMNRF#9	<p>Chapter 1.0 – Background and Introduction 1.5.4.8 – Water Management Appendix D4 – Hydrology, D5 – Site Waters Balance Summary</p>	<p>General Comment -</p> <p>Lakes and Rivers Improvement Act – Location Approval and Detailed Design Approvals:</p> <p>GenPGM should provide sufficient quality of information in the EIS submission to support the permitting requirements eg. high level of design details for all proposed dams, pipelines, diversions, spillways, ponds, ditches, water crossings etc and any other related engineering components, and include the assessment of impacts to NDMNRF mandated interests eg. fish, wildlife, wetlands etc</p> <p>Any alterations / improvements to an existing waterbody, such as dams or channelization (etc.) may require Lakes and Rivers Improvement Act approval and/or may require</p>	<p>For all proposed engineering related structures, NDMNRF requires detailed information including: ownership or authorized rights, topographic information, hazard potential classification, hydrologic and hydraulic analyses, geotechnical field and office investigations and calculations, soils analysis, detailed (stamped) plans and specifications, and environmental analyses. At permitting, GenPGM is required to submit the individually detailed information packages to NDMNRF. NDMNRF will screen information to determine requirements for approvals under LRIA and if any</p>

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		Public Lands Act authorization. Again, this will vary depending on land tenure (previous NDMNRF comment).	<p>other approvals or authorizations are required.</p> <p>NDMNRF requires GenPGM provide a sufficient level of detail for each of these project components in the EIS, and include the assessment of impacts, and mitigation. If this information is not included in the EIS, then it will need to be submitted separately and subject to further review and assessment after the hearing.</p>
NDMNRF#10	<p>Section 7.3</p> <p>And Section 1.5.4.15 Page 1.57</p>	<p>The NDMNRF has noted that the proposal is that “<i>..on-site organic and non-hazardous waste to be stored on site</i>”, and that “<i>organic and non-recyclable solid non-hazardous waste collected at the mine site will be disposed of within the landfill situated in the PSMF</i>”.</p> <p>Should a new landfill / waste disposal site be identified as needed on Crown land, it is recommended that this be identified through this EIS. However, should a new site not be included in this EIS, a Project amendment or addendum may be required prior to NDMNRF considering the activity through our normal disposition process. NDMNRF’s disposition process triggers EA Act requirements including consultation with the public, agencies, and Indigenous communities. Please be advised that the Public Land Act authorizations for new landfill / waste disposal site on Crown land is a very lengthy process.</p>	NDMNRF requests that this information be shared with GenPGM.

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NDMNRF#11	Section 6.3.2.15 Page 6.591	<p><i>“A fire could occur on or around the Project site as the result of various causes. Given the planned clearing associated with the development of Project infrastructure, it is anticipated that the site itself will act as a fire-break and on-site fires would be localized and contained onsite. Various means will be used to mitigate fire related issues and the basis for the fire protection system for the Project will be the applicable National Fire Protection Association (NFPA) codes. Response procedures associated with a Project site fire will be set out in the EPRP.”</i></p> <p>The EIS contains insufficient information related to Wildland Fire – Provincial Policy Statement (2020) and the Forest Fire Prevention Act. Legislative requirements state that any mine located within 300 metres of a forest area requires the surrounding area to be cleared of flammable debris for a distance of at least 30 metres.</p>	<p>NDMNRF requires GenPGM update their EIS to recognize / include the 30m cleared buffer as the minimum requirement (Forest Fire Prevention Act – prevention measures s(17)).</p> <p>Further, should this 30m clearing not have been accounted for and/or included in the SSA, this additional removal of vegetation (trees, wetlands, etc) should be assessed in the EIS.</p>
NDMNRF#12	Section 6.4.3 Page 6.607	<p><i>“A major fire at the site could cause property damage and the interruption of operation. Given the planned clearing associated with the development of the mine infrastructure, it is anticipated that the site itself will act as a fire-break and that this may limit the extent to which a large-scale fire would result in extensive on-site damage. GenPGM will develop a response procedure within its Emergency Preparedness and Response Plan (EPRP) that considers a large-scale forest fire in the vicinity of the Project site. In the event of such a fire GenPGM would work closely with local and regional emergency services personnel to ensure worker safety and the site. The level of on-site response would depend on the level of perceived risk to site personnel and infrastructure. In a worst-case scenario, the mine operations could have to be shut down temporarily. There will be fire-fighting capacity on the Project site but this capacity is geared towards</i></p>	<p>NDMNRF requires GenPGM amend the EIS to include the following information and recommendations:</p> <ul style="list-style-type: none"> • Ontario has a forest fire control program in place to identify and control fires, reducing their potential magnitude and extent, and their potential consequent effects on the Project during any phase. • The management, monitoring and control of forest fires in Ontario are the responsibility of

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	<p>Section 6.2.9.6.2 Page 6.429</p>	<p><i>dealing with smaller scale on-site fires, and not a large-scale, regional forest fire.</i></p> <p><i>“GenPGM will co-ordinate its Emergency Preparedness and Response Plan (EPRP) with the Town of Marathon emergency services department.”</i></p> <p>There is insufficient information in the EIS related to Ontario's role in Fire prevention and the Project's proposed Emergency Response and Preparedness Plan.</p>	<p>the NDMNRF under the <i>Forest Fires Prevention Act</i>.</p> <ul style="list-style-type: none"> • Day-to-day management of these issues is carried out by the NDMNRF's Aviation, Forest Fire and Emergency Services program. That program coordinates forest fire detection, monitoring, suppression and public information and education services for Ontario (GO 2014c). • On-the-ground assistance and response to major fire events is coordinated by the NDMNRF's Fire Management Headquarters, in Geraldton, with assistance (as necessary) from private contractors (e.g., Geraldton Community Forest). • The proposed safety and security programs for the Project should be capable of rapid detection and response to a forest fire threat. • A minimum of 30 metres surrounding Project components is required to be cleared of flammable debris, which will reduce the potential for a fire to affect the structures, even

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			<p>though the structures will be inherently fire resistant.</p> <ul style="list-style-type: none"> • The Project's Emergency Preparedness and Response Plan will need to address training employees in fire prevention and control. This Plan is required to be in place in conjunction with community, Biigtigong Nishnaabeg, and provincial emergency response crews to provide for rapid detection and response to fire. This includes fires that could start within the SSA as well as fires approaching from outside the SAA (e.g., forest fires). • Communication with local emergency providers should be established so that roles and responsibilities are understood, and that the necessary resources required to respond are in place. • In the event that a forest fire did occur close to the Project, while Project components would not likely to be substantively affected by the fire, there is potential risk of contact with fuel storage tanks and the explosives facility,

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			<p>thereby potentially creating a risk of fire or explosion. Emergency response capability, emergency response plans, and fire trained individuals and response equipment for such accidental events should be in place.</p> <ul style="list-style-type: none"> In addition to the Municipality of Marathon, Biigtigong Nishnaabeg, and the NDMNRF's – Fire program will need to be engaged in the development of the Emergency Response and Preparedness Plan. <p>The following is the reference to the above cited document: <i>Government of Ontario (GO). 2014c. Forest Fires, Ministry of Natural Resources and Forestry. Accessed on January 29, 2015 from http://www.ontario.ca/law-and-safety/forest-fires, last updated November 19, 2014. in Emergency preparedness http://www.ontario.ca/law-and-safety/emergency-preparedness.</i></p>

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NDMNRF#13	EIS Addendum	<p>There is too much vague language throughout this submission. Terminology includes but is not limited to - <i>not expected, assume, predicted, negligible, small contribution, relatively, to be determined, to be implemented, not significant, overprinting, restore.</i> It is difficult to assess / understand the impacts of this project on the Valued Ecosystem Components (VECs) when the analysis provided is not qualitative in nature.</p> <p>Examples include but are not limited to:</p> <ul style="list-style-type: none"> • Not expected – 6.2.3.3.1 Provincial Sediment Quality “<i>The No Effect Level is based on levels of chemicals which are so low that significant amounts of contaminants are not expected to be passed through the food chain.</i>” • Assumed – 6.2.3.6.2 Analytic Assessment Techniques “<i>For the assessment, groundwater recharge originating from the MRSA, ore stockpile, PSMF, and WMP did not consider physical flow or chemical processes and was assumed to discharge to the natural environment to provide a conservative assessment of groundwater loading to the receiving environment.</i>” 6.2.3.7 Surface Water Quality “<i>Due to the conservative nature of the assumptions on which the numerical assumptions are based, a high degree of confidence can be assumed.</i>” • Predicted – 6.2.3 used throughout. Use is based on models and their predictions and based on those predictions, more predictions are made. • Negligible – Table 6.2.4-2 and 6.2.4.3.5 Residual Effects Characterization “<i>The potential lethal effects on fish during operation would be limited to the effects of blasting and therefore adverse in direction, negligible in magnitude as no additional change to habitat loss will occur, negligible with respect to geographic extent as highly localized, high sensitivity with respect to timing as could occur throughout</i> 	<p>NDMNRF requests GenPGM update respective sections of the EIS to provide a more qualitative assessment of actual impacts, mitigation efforts to be applied, and expected residual effects. This will provide a more fulsome assessment and understanding of the effects of this project, including cumulative impacts. Without this assessment and information NDMNRF is unable to determine if the impacts identified in the various sections are reasonable.</p>

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		<p><i>periods sensitive life stages for fish, medium in duration, medium in frequency, and reversible as the effect will cease once the stressor is removed.”</i></p> <ul style="list-style-type: none"> • Small Contribution – 6.2.1.6.1 Predicted Air Quality for the Cumulative Scenario <i>“The background levels of both benzene and benzo(a)pyrene are above applicable air quality criteria, with the Project only providing a small contribution to the cumulative concentration”.</i> • To be implemented/assumed – 6.2.5.3.2 Influence of Consultation and Engagement on the Assessment <i>“Concern relating to existing erosion along the Pic River and potential mitigation measures to be implemented through the Project development”</i> 6.2.5.6.1 project Residual Effect <i>“Seeding of these stockpiles to stabilize soils and provide erosion protection will be implemented where natural regeneration does not occur (i.e., given the nature of these material stockpiles from a growth medium perspective, it is assumed that they will revegetate naturally to some extent).</i> 6.2.5.7 Prediction Confidence <i>“As described, various practices and procedures will be implemented to mitigate fugitive air emissions to low levels.”</i> • Not Significant/predicted – 6.2.3 Determination of Significance – used throughout; 6.2.3.1.2 <i>“following the cessation of discharge to Hare Lake sediments were predicted to recover to baseline conditions and therefore the effect was reversible. The residual effects on sediment quality were deemed to be not significant.”</i> • Overprinting – 6.2.3.6.3 Project Pathways <i>“Surface water levels and/or flows are expected to be affected by the reduction of contributing subwatershed areas through the collection of mine contact water within the SSA, and the overprinting of existing watercourses</i> 	

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		<p><i>and lakes from site infrastructure and mine components.”</i></p> <ul style="list-style-type: none"> Restore/expected – 6.2.3.6.4 Closure <i>“This strategy ensures control of water quality on and off site while site decommissioning and rehabilitation activities are implemented, allowing the water quality associated with these site aspects to stabilize. Following this five-year period, it is expected that natural surface water drainages will be restored.”</i> 	
NDMNRF#14	<p>7.3 7.1.2.1 Page 7.2</p>	<p>Discussion is expansive regarding monitoring of all conditions and all situations on site throughout this addendum. Information is missing regarding who will be monitoring the various components, how many monitors will be carried out to cover all the variables, how often inspections will be carried out, what reporting is required and to whom, if inspections be joint, how compliance will be achieved, and how government will provide input or oversight. This section assumes this project will be perfectly managed without setting a plan for adherence to the goal.</p> <p>For example, the EIS indicates that they will practice recycling however it is unclear if Marathon has an active recycling program. In numerous remote northern communities, recyclables are destined for landfill due to the cost of shipping and low prices for product. The EIS should set out how GenPGM will comply and implement recycling including if it will ship product to far away processing facilities whether there is a facility willing to take it and how will this be assured and monitored.</p> <p>Measurable parameters would be used to qualify / quantify baseline information, and carry forward for repeatable monitoring efforts on VECs during project construction, operation, closure, and post closure.</p>	<p>The mechanisms for input and development of the monitoring plans is important as they will be used to meet the project’s requirements, and to ensure that the mitigation measures are effective.</p> <p>NDMNRF requests GenPGM include conceptual level monitoring plans in this EIS. These plans should include, at a minimum, details relating to:</p> <ul style="list-style-type: none"> who (eg agency, community, etc) these plans will be developed in consultation with; what regulatory permits these plans will be developed to meet; and / or when each of these plans is anticipated to be finalized. <p>NDMNRF recommends that monitoring plans be developed in coordination with willing Indigenous communities who are being consulted about the project.</p>

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		<p>Monitoring is required to ensure that what has been identified in the EIS is accurate and to provide for an adaptive management approach designed to prevent or minimize impacts to the environment.</p>	<p>NDMNRF requests GenPGM include as part of the project a protocol of mandatory notifications / invitations to participate (with respective agencies and Indigenous communities) whenever monitoring is taking place to ensure commitments are being followed.</p>
<p>NDMNRF#15</p>	<p>Section 6.2.6.6.1 page 6.260-261</p> <p>and</p> <p>Section 6.6.6.6.1 page 6.640</p>	<p>Impacts from the project to forest cover are compared to commercial forestry as equal; however, a direct comparison is not feasible because the EIS does not provide for renewal whereas commercial forestry has a renewal component.</p> <p>The statement here is that forestry activities are “...not materially different than that represented by commercial timber harvesting alone.”</p> <p>However, commercial forestry includes specific renewal requirements that are not contemplated by the current EIS. The EIS states “...that vegetation that becomes established during active closure will differ from existing conditions and that “...however it is also likely that productive commercial forest will not be restored in the SSA.”</p> <p>As well, there will be effects to wildlife dependent on the forest conditions if the forest is not restored to its current condition after closure</p>	<p>NDMNRF requires GenPGM include meaningful discussion of the loss/changes in forest cover in the EIS. The evaluation should include the long-term effects of the new forest condition in the SSA, and include effects on the Local Study Area (LSA). In addition, wildlife that would transition to the SSA and/or LSA due to the proposed changes in forest cover should be assessed / recognized.</p>

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NDMNRF#16	Section 6.2.4.6.3	<p>The determination of “not significant” throughout the EIS is an overstated conclusion lacking supportive data. As an example in Section 6.2.4.6.3 (change in water quantity), only Stream 6 impacts are described to convey some aspect of significance; however, Table 6.2.4-6 previously demonstrated numerous changes with larger effects on the same parameter for multiple watersheds in relation to Mean Annual Flow (MAF). NDMNRF disagrees with the interpretation and summary statements in Section 6.2.4.6.3, as they relay only fragments of the information provided previously; thus, inconsistently reflecting the long-term effects outlined in their discussion within their significance determination. The outcome for the streams in question are certainly significant in relation to fish and wildlife given the proposed changes to the features; all headwaters of Streams 2 and 3 are under the MRSA. Significance does not appear to relate to the condition created by the project but by how the surrounding area is able to compensate for the impacts, which is mainly due to its remoteness and lack of development. There should be a mitigation component that reflects the proposed impacts.</p>	<p>NDMNRF requires GenPGM revisit the information regarding conclusions of “Not significant” to state more clearly and consistently throughout the EIS.</p> <p>In regards to the example stated, the determination of significance around changes in water quantity requires a meaningful discussion, inclusive of all proposed changes and outcomes in the SSA and LSA. This discussion should also address LRIA conditions for approval.</p>
NDMNRF#17	<p>Section 6.2.3.1.2 page 6.101 page 6.207 Table 6.2.3-4 and Table 6.2.4-6</p>	<p>Information provided regarding streams and/or watersheds is conflicting. Statements such as reduced groundwater discharge (m³/day) to watercourses 102 and 103, from baseline 1,002 to 47, and 287 to 28, respectively, are followed by: “... <i>the natural surface water drainages for streams 2 and 3 will be restored.</i>” This is stated as part of the HADD compensation plan. However, on the same page, the text states that fish can no longer rely on this habitat and damage is irreversible. Watershed Mean Annual Flow (MAF) for 102 and 103 will be reduce 98% and 96%, respectively.</p>	<p>NDMNRF requires GenPGM amend the EIS to clarify statements on streams being restored with loss of MAF, groundwater discharge and new alignments. Although there could be some new stream creations, restoration is unlikely to meet the current stream conditions due to the proposed changes from the Project.</p> <p>Existing condition as currently described should not be used to establish the restoration targets for affected streams, as survey</p>

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		<p>It is not clear how a stream is being “restored” when the proposal is to only restore a small portion of its groundwater (Table 6.2.3-4) and allow a large loss of MAF. The irrevocable changes do not support that statement. The creation of streams in proximal locations to existing streams should not be considered restored but rather new streams, supported with predictable parameters, such as expected flows, water quality and/or potential use by fish and wildlife, etc. As an example, the loss of groundwater discharge to watersheds 102 and 103 would likely not create the cold-water streams that exist today.</p> <p>As well, the existing condition should not be used to describe a target for rehabilitation. Aquatic surveys were restricted in scope with <i>most surveys focused on determining fish presence vs non presence</i>. In some cases, this scope led to only one fish being identified in an area and solely being used to describe the existing condition of a fish bearing waterbody. Hence, existing survey information should not be solely used to establish future targets for restoration</p>	<p>information collected to date is insufficient to properly categorize existing stream habitat conditions.</p>
NDMNRF#18	Section 6.2.3.6.4	<p>Hare Lake – Thermal Properties There will be increased discharge into Hare lake with the addition of seepage from the mine rock storage area and changes to the tailings facility. However, the CORMIX model was not updated and re-run considering these new parameters, although the previous results are referenced in the updated EIS. The CORMIX model should be updated to determine any additional effects on Hare Lake thermal properties.</p>	<p>NDMNRF requires GenPGM include the results of an updated CORMIX model run to ensure Hare Lake thermal property as a cold-water lake is not impacted from increased and seasonal effluent amounts being discharged to Hare Lake.</p>

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NDMNRF#19	Section 1.5.2.3 Page 1.40 – 1.45	<p>Decommissioning and Closure</p> <p>The NDMNRF recognizes that a draft Conceptual Closure Plan was prepared and included as a supporting document to the original EIS, and that an update to this Closure Plan will be completed. Through review of this EIS the location of various project components eg dams, ponds, berms are still relatively conceptual and thus locations remain unclear. It is noted that GenPGM indicates that diverted watercourses will be restored, ponds breached, etc. Please be advised that with any proposed structures remaining on Crown land at mine closure will be retained by the proponent ie NDMNRF will not be accepting structures on Crown land at end of mine life that may require maintenance.</p>	NDMNRF requires GenPGM amend the EIS to provide a section on the responsible authority, monitoring, and maintenance of any structures. This includes short and longer term plans for any remaining dams / berms / waste disposal sites, etc after mine closure.
NDMNRF#20	Appendix D6 Executive Summary Section 7.2.1 Page 7.5	<p><i>“Offsets and compensation will be required in relation to Fisheries Act subsection 35(2) and Section 27.1 of the Metal Mining Effluent Regulations, respectively. Offset/compensation objectives are identified and potential offset/compensation elements are described. This document is meant to provide the foundation for the full FHOFCP that will be developed collaboratively with input from local Indigenous communities and people, federal and provincial agency staff and other interested parties”.</i></p> <p>1) It is recognized that the Fish and Fish Habitat Offsetting Plan was updated (dated March 2021), however no discussions have occurred with NDMNRF related to the updates, specifically related to potential offset projects.</p>	<p>NDMNRF requires GenPGM:</p> <ol style="list-style-type: none"> 1) engage with respective federal and provincial agencies, and Indigenous communities to determine how to address the fisheries offset and compensation in the current legislative / fish wildlife natural resource management framework. 2) Work with federal and provincial agencies, and Indigenous communities to develop any necessary offset projects if those projects need to be considered off-Lease and on Crown land,

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		<p>2) Two potential offset projects are no longer supported by NDMNRF as follows:</p> <ul style="list-style-type: none"> • <i>“Fish habitat enhancement at the Harvey Creek-Aguasabon River confluence, west of the Project near Terrace Bay”;</i> <p>This project was completed by NDMNRF a few years ago.</p> <ul style="list-style-type: none"> • <i>“Fish passage improvement and habitat enhancements in Hare Creek”</i> <p>The NDMNRF does not support removing a natural barrier to allow non-native fish species or salmonids further access to inland Hare Lake.</p> <p>3) Although unknown to GenPGM that the Harvey Creek project was completed, the NDMNRF is concerned that this proposed project was not included in the Fish and Fish Habitat Regional Study Area (RSA).</p>	<p>NDMNRF requires that new projects / sites proposed for fisheries off-set measures on Crown land be evaluated in the EIS Addendum as they may trigger further EA Act requirements and/or authorization under the <i>Lakes and Rivers Improvement Act</i> or <i>Public Lands Act</i>.</p> <p>3) NDMNRF will require rationale to support the application of any new proposed mitigative actions outside of the current Fish and Fish Habitat RSA that can reasonably be considered for this Project.</p>
NDMNRF#21	Section 5.2.4.4	<p>Phase 4: Detailed Design and Permitting Consultation (2021 to 2023)</p> <p>The EIS notes that <i>“As part of Phase 4 Consultation, GenPGM is committed to ongoing consultation beyond EA approval and throughout the environmental permitting process.”</i></p>	<p>NDMNRF requests GenPGM include a detailed list of all the NDMNRF permits or authorizations, and details about those permits, that it expects to need in connection with the project.</p> <p>NDMNRF requests GenPGM make it clear in the EIS that the EIS process is the main vehicle and process for consultation with Indigenous communities regarding the project, as well as regarding all those related permits and authorizations that are addressed in the EIS in sufficient detail for communities to consider</p>

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			<p>what adverse impacts they may have on their asserted or established Aboriginal or Treaty rights.</p> <p>NDMNRF requests GenPGM be clear in the EIS that additional consultation may be necessary in connection with permits or authorizations that are ancillary to the overall project, and whose details are not sufficiently known at the time of the EIS and panel review process to support meaningful consultation with Indigenous communities during the impact assessment process.</p> <p>NDMNRF may require GenPGM carry out the procedural aspects of consultation regarding permits or authorizations after the impact assessment process.</p>
NDMNRF#22	Terrestrial Environment Baseline Report Update, section 6.2, pg 38; EIS Update	<p>NDMNRF agrees with the background document in that several of the waterbodies in the SSA may qualify as Significant Wildlife Habitat (SWH) for amphibians. However, current surveys lack the specific details to confirm the SWH classification. Ecoregional Criteria Schedule for Ecoregion 3W lists the defining criteria for significant amphibian breeding habitat as:</p> <ul style="list-style-type: none"> - Presence of breeding population of 1 or more of the listed salamander or newt species or 4 or more of the listed frog or toad species including either Northern Leopard Frog, Green Frog or Mink Frog and at least 20 breeding individuals (adults, juveniles, eggs/larval masses) 	<p>NDMNRF requires GenPGM undertake a determination of SWH to waterbodies with anticipated impacts, which may not be just limited to SSA but may include the LSA. This will likely need further work with surveys on amphibians to determine SWH. As well it may require surveys in the RSA to determine mitigation options to find comparable waterbodies for suitable transfers.</p>

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		<ul style="list-style-type: none"> - Listed species include Eastern (Red-spotted) Newt, Spotted Salamander, Blue-spotted Salamander, American Toad, Gray Treefrog, Boreal Chorus Frog, Wood Frog, Spring Peeper, Northern Leopard Frog, Green Frog, Mink Frog and Mudpuppy. <p>Without further population estimates, all fishless waterbodies are recommended to be considered SWH with a minimum of 20 breeding adults, using the precautionary principle. The EIS needs to address how these features will be addressed (e.g. where habitat can be maintained adjacent to SSA, loss of habitat in SSA and relocation of animals, adults and juveniles. The EIS also needs to address how overpopulation of transfer areas will be avoided, considering aquatic as well as terrestrial environments. This SWH may also fall within consideration of a LRIA authorization.</p> <p>Waterbodies with newts identified and would be considered SWH include: L1, L2, L9, L10/11, L13, L13a, L16, L22, Malpa Lake, and headwater streams 3 & 4.</p> <p><i>Please note: Amphibians are not discussed in the EIS update.</i></p>	<p>NDMNRF requires GenPGM amend the EIS to address mitigation in regard to all amphibians, including timing constraints and habitat carrying capacity.</p>
NDMNRF#23	<p>Terrestrial Environment Baseline Report Update Bats pg 6.365 and Ir 23.3</p>	<p>In response to IR 23.3, bat surveys were completed. However, the data collected to date for determination of bat presence in the area was seasonal, local and partially complete. The data shows the recorders were moved throughout the breeding season between sites. Given only partial data, the study provides a rough estimate of use. The data suggests that the area potentially supports roosting habitat for several bat species, based on high numbers observed at specific sites presented in Table 2 (Terrestrial Update report). Significant Wildlife Habitat should be applied to all bat species found within the SSA and LSA.</p>	<p>NDMNRF requires GenPGM discuss, in the EIS, all bat species mitigation using SWH criterion to determine appropriate measures for addressing maternity roosting habitat.</p>

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		<p>Bat boxes may be one form of mitigation to consider. Applicability of use for the species present and habitat in this area needs to be considered.</p>	
NDMNRF#24	<p>Sec. 6.2.8.1.11, pg 6.367 EIS guidelines 1.2.1</p>	<p>“Sustainable” and “not significant” – commonly used terms in the EIS, but do not reflect some of the thorough discussion around parameters. For example, the determination in regards to Rusty Blackbird (RB) (one breeding pair in SSA) and Canada warbler (CW)(numerous breeding pairs in SSA) – in both cases all would be lost in the SSA, which should be a significant loss to the SSA as there is no mitigation. The RB is the only breeding pair found in the area, including the RSA; therefore, it is relatively significant being the only pair around. Impacts on the CW are noted in the LSA from noise, predicting losses in this area that appear significant when viewing the data; however, there is no proposed mitigation. There are numerous numbers of CW in the RSA, so lack of proposed mitigation within the LSA could be interpreted as an indication that CW presence is not considered significant at that scale. The rationale behind the EIS conclusion is not clearly outlined. The EIS guidelines asked to “... predict whether there will be likely significant adverse environmental effects after mitigation measures are implemented.” Use of adjacent study areas should not be relied upon to mitigate environmental effects at the project site.</p>	<p>The common “not significant” determination of significance has impaired NDMNRF’s ability to understand the impacts in the EIS.</p> <p>There is meaningful discussion around the values and effects, but the EIS must present the significance of project alterations / activities at the appropriate scale, rather than dismiss the resulting impacts because the next larger scale can compensate for the loss where it occurs. The ask in the EIS guidelines was to address the effects after mitigation, however the EIS is only using the larger scale as the mitigating factor to counteract the effects at the smaller scales, which does not account for habitat carrying capacity and species abundance. Scale-specific mitigation measures need to be considered and outlined within the document. If a larger scale is to be considered a mitigating factor, then the appropriate documentation and evidence of available habitat capacity and species suitability need to be discussed.</p>

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			<p>The determination of significance must address the mitigation measures proposed, ie. each area (SSA, LSA and RSA) would be related to its own impact statement from the Project.</p>
<p>NDMNRF#25</p>	<p>General comment Shapefiles for the project components</p>	<p>The NDMNRF has requested shapefiles for this project to better understand location of all project components as they relate to interests that NDMNRF regulates and likely future authorizations. To date, we have received the generic shapefile illustrating polygons of the Site Study Area, Local Study Area, and Regional Study Area; and, no additional information in the attribute table. This generic information is not sufficient.</p>	<p>The NDMNRF recognizes that detailed shapefiles may not currently be available, however GenPGM should have a conceptual level of understanding of location of all project components, including project sequencing that could have been shared with agencies to assist in review of this project.</p> <p>NDMNRF requests the Panel advise GenPGM that in order for NDMNRF to be able to consider the issuance of any permits we will require the GIS layer package related to the entire project including the following details (please note that this is not the exhaustive list but a general indication):</p> <ol style="list-style-type: none"> 1. Lakes and Rivers Improvement Act <ul style="list-style-type: none"> • all locations for dams, berms, ponds, spillways, water diversions, waterbody overprinting, water crossings, water intake structures, and effluent discharge locations. The MNDMNRF will require similar information at mine

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			<p>closure as additional authorizations may apply to decommissioning / restoring various project components.</p> <ol style="list-style-type: none"> 2. Transmission line 3. All conduits used to control the site's water budget 4. Existing and restored watershed polygons 5. All proposed seepage collection systems/ ditches (with flow direction) 6. All proposed site ditches (with flow direction) 7. All proposed construction, access and haul roads. 8. All water crossings. 9. All overburden storage areas 10. All proposed Mine Rock Storage Areas 11. All temporary and permanent soil storage areas. 12. Open Pits full extent delineation 13. All ore stockpile locations 14. All constructed collection ponds 15. Process Solids Management Facility polygon as well as: <ul style="list-style-type: none"> • each cell and splitter dams • tailings pipeline and overhead powerline • emergency spillways (with flow direction) • dams • roads • diversions channels (with flow direction)

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			<ul style="list-style-type: none"> • seepage collection ditch (with flow direction) 16. Tree clearing and any associated vegetated buffers
NDMNRF#26	<p>2012 EIS Section 1.4.3 Pg 1.55</p> <p>EIS Addendum 6.3.2.16 - 18 table 6.3.2 page 6.599</p>	<p>The EIS Guidelines state that the EIS shall describe the Project as it is planned to proceed, including project phases and activities. The Guidelines also state that the EIS will contain sufficient detail to be able to identify major mine components or structures which are likely to have a high failure consequence during construction, operation closure and post-closure and where monitoring efforts will be required for the purpose of risk analysis. The EIS also states that the Proponent shall collect and undertake additional detailed information and analysis that may be required for obtaining permits and authorization from federal and provincial authorities. It appears that the EIS documents fail to meet these requirements. Very general statements are made regarding mine components and structures.</p> <p>While it is understood that detailed designs for the mine infrastructure will follow the environmental assessment, information provided in the EIS relating to mine site development and design is not detailed enough. Conceptual level design and development information in sufficient detail is needed in order to assess the potential for environmental effects with any level of confidence. Mine site development is shown in four 8 ½" x 11" drawings. This is not sufficient information to consider the proposed engineering design and potential environmental effects, safety concerns, etc. Some issues of concern relating to mine infrastructure design and development include:</p>	<p>Sufficient detail is required in the EIS in order that potential environmental effects can be assessed with a satisfactory degree of confidence.</p> <p>Pic River floodplain is comprised of thick deposits of sand, sandy silts and clays. This area is prone to erosion and bank failures; there have been several large failures in this area in recent years. Construction of structures in these areas will require additional engineering and higher safety factor to ensure that the structures do not fail. These additional risks of failure should be accounted for during design, construction and monitoring. Development in these areas will likely require steep embankments and fill to create level workspace. Insufficient information is provided to determine how or if this has been accounted for.</p> <p>Dam hazard classification and dam design will need to address the potential risk associated with failure and the incremental loss (either short term or long term). The appropriate</p>

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		<ul style="list-style-type: none"> • Proposed development adjacent to the Pic River raises issues relating to runoff, erosion and slope/bank stability along the steep banks of the river. • Little to no detail is provided regarding dam construction and design. All dams will require Lakes and Rivers (LRIA) Approval. • Erosion control measures for all activities as outlined in EIS table 1.4-5 will be required but are not included in the project description. 	<p>level of safety required for each individual dam design will depend on the individual dam failure consequence. These considerations must be looked at throughout the entire life of the dam and from start to completion of the Project.</p> <p>Potential for erosion during all phases of the project can have an effect on the environment. Understanding mitigation measures is required in order to understand effects.</p> <p>NDMNRF requires GenPGM provide in the EIS conceptual design information for the mine infrastructure at a level of detail such that potential environmental effects can be assessed.</p>
NDMNRF#27	Report 11 Section 3.3.1.1 Pg 9	Water management, including storm water and surface run-off, water quality and supply have not been addressed in sufficient detail as per the requirements in the EIS Guidelines.	<p>Surface water management is essential to managing potential impacts of the project.</p> <p>NDMNRF requires GenPGM amend the EIS to:</p> <ul style="list-style-type: none"> • address run-off and sediment control works. • provide conceptual design features of all water management facilities.

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			<ul style="list-style-type: none"> address site water diversions and potential effects on the receiving environment.
NDMNRF#28	Report 11 Section 3.3.1.1 Pg 9	The Environmental Design Storm (EDS) selected may not be the Inflow Design Flood (IDF) for dam design.	<p>During the <i>Lakes and River Improvement Act</i> approval process, the IDF is based on the dam hazard classification which deals with the “importance” associated with the dam and the level of risk associated with a failure of the dam. In other words the IDF and dam design will depend upon the hazard classification. Hazard classification is directly related to the consequence associated with an individual dam failure.</p> <p>The HPC (hazard potential classification) for dams will dictate the design flood for the structure. The NDMNRF will need to confirm GenPGM’s proposed HPC before GenPGM can assume an IDF event for the design of the structure(s).</p> <p>The EIS should address the IDF in the context of dam hazard classification</p>

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NDMNRF#29	<p>Report 11 Section 3.1.1.3 Pg 10</p> <p>EIS Addendum Section 1.5.4.7 Page 1.52</p>	<p>In Report 11, water supply for the mine is identified as being fresh water accumulated in the PSMF basins. Document #18 indicates that water may be taken from Hare Lake or Pic River.</p> <p><i>“the first choice to supply supplemental water is Hare Lake. In the rare instance where water flow is too low in the Hare lake system, supplemental process water may be obtained from the Pic River.”</i></p>	<p>Understanding the surface water management is critical to understanding the effects of the project.</p> <p>NDMNRF requests GenPGM include the Pic River and Hare Lake in the SSA and to include an evaluation of impacts for these waterbodies on their respective aquatic environment, including cumulative impacts (especially related to Hare Lake) in the EIS.</p>
NDMNRF#30	<p>Report 11 Section 3.1.6 Pg 13</p> <p>2012 EIS Section 1.4.3 Pg 1.55</p> <p>EIS Addendum Section 1.5.4.11 Page 1.56</p>	<p>Reports indicate that access roads may require stream crossings, bridges, and or culvert crossings but no detail is provided regarding conceptual design, proposed location, design standard, crossing number or type, etc. The EIS Guidelines state that the EIS will describe the Project as it is planned to proceed, including project phases and activities one of which is the construction of new mine access and haul roads including any water crossings, and water body shoreline works or undertakings.</p> <p><i>“Several roads will be developed with the mine site to provide safe and ready access to all mine infrastructure, with conceptual locations identified on figure 1.5-1”</i></p>	<p>In the absence of this information there is no consideration or analysis of the implications of the proposed roads and water crossings with regard to fish and aquatic ecosystems, navigable waters or hydrology.</p> <p>NDMNRF requires GenPGM provide information in the EIS in sufficient detail to allow for a conceptual understanding of the access roads and water crossings proposed for the project. And, discuss the proposed access roads and crossing in terms of potential impacts and mitigation.</p>

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NDMNR#31	<p>2012 EIS Report 20 Section 4.3 Pg 21</p> <p>Section 4.4 Table 4.4.2 Pg 25</p> <p>Table 5.2.3.2 Pg 38</p>	<p>The data set for minimum and maximum flows is very limiting.</p> <p>Continuous stream data has only been collected for short time periods for each station. As a result the data does not capture the spring freshet (peaks) or the low flows during the winter months.</p> <p>Report 20 states that “the Local Study Area values do not necessarily reflect peak or minimum values for each year due to the fact that freshet and winter months were not monitored.” Since the freshet and winter months were not monitored, maximum or minimum flows shown in table 4.4.2 are at best estimated flows for these time periods only and do not necessarily represent minimum or maximum flows.</p> <p>Page 30, Section 5.1.3 states “Review of Water Survey of Canada data indicates that annual low flows typically occur in the winter months of Feb and March . . . “ which further reinforces the concern that the data does not represent peak and low flows.</p> <p>It should also be noted that the short term monitoring that has been carried out does not account for “dry” or “wet” years; and that several of these stations have been monitored for 4 to 6 months only. Prorating of the nearby gauged watershed and looking at correlations for these peaks and lows is questionable.</p> <p>Data collected over a short timeline of 1 to 3 years, combined with the fact that the spring freshet was missed, is not adequate for the calculation of instantaneous peak flow data in Table 5.2.3.2, page 38.</p>	<p>Each proposed dam will need to be designed for a specific hydrological event unique to its location / watershed. Peak flows and flooding events are typically a primary focus during the dam design stages. Each dam will be given a hazard classification. A high hazard dam will have more stringent design requirements than that of a low hazard dam. A higher hazard would be assigned in instances where the dam is high, has a large reservoir up stream of a community or infrastructure, and/or contains a contaminant in the reservoir whereas, a small dam with little or no reservoir, no contaminant and located in the middle of nowhere would be assigned a lower hazard. An increased high water event would be used for the design of a higher hazard classification than for a lower hazard classification. Because we are not willing to take as high a risk for failure. It is for these reasons that it is extremely important to have a clear understanding of local hydrology based on good data. This is particularly important with regard to the high flows events, as these are what are used for the dam design. As noted, the hydrology appears to have missed capturing any of the high and low water events in any of the stream systems that they’ve monitored.</p>

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			<p>Stripping vegetation and land clearing for mining will increase risk of erosion and adequate erosion control measures will be required. Times for many of the streams and watercourses will increase. Peak flows in these areas will also be vulnerable to an increase in max flows. Redirection of water may create an increase or decrease in flows in the affected watersheds.</p> <p>A clear understanding of how the project will impact watersheds and flow rates is required in the EIS and for future permitting. As well as an understanding of how changes in flow will effect existing fish and fish habitat in impacted streams and expected targets for restoring affected watersheds is required.</p> <p>The methodology utilised in Document #20 to derive peak flows would not be considered adequate for Lakes and Rivers Improvement Act approval.</p> <p>NDMNRF requires GenPGM describe, in the EIS, based on sufficient and reliable data, the hydrological regimes, including monthly, seasonal fluctuations and year-to-year variability of all surface waters.</p>

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NDMNRF	Information Source <i>Section or page # of EIS 2012 EIS Addendum 2021, previous Information Requests, etc.)</i>	Information for the Joint Review Panel to consider when deciding whether additional information is needed	Rationale information is needed or question Panel should ask from proponent
NDMNRF#32	Report 20 Section 5.3 Pg 40	Cannot find Table 5.1.1 referred to in the third paragraph, page 40 in Report 20 which indicates that low flows occur in Feb-March.	NDMNRF requests GenPGM include the missing table. Please provide or locate Table 5.1.1
NDMNRF#33	Report 20 Section 5.3.2 Pg 41	The discharge values in Sections 5.3.2 – 5.3.4 and in Appendix A S1 – S41 are questionable. How is a discharge as small as 0.0002 cms (as an example of a measure provided) measured? The data provided in the identified sections does not make sense.	NDMNRF requests GenPGM explain in the EIS how discharge data was collected
NDMNRF#34	Report 20 Appendix A	The units in Stream flow Discharge calculations in Appendix A are suspect. Velocities are recorded as meters per second. The previous tables indicate flow meter recordings in feet per second and the lower limit as 0.01 ft per second. Clear and reliable data is required to support EIS conclusions.	NDMNRF requests GenPGM explain in the EIS the varying units used in the Stream Flow Discharge Calculations.

Marathon Palladium Project
Sufficiency Review of Environmental Impact Statement Addendum

NDMNRF	Information Source <i>Section or page # of EIS 2012 EIS Addendum 2021, previous Information Requests, etc.)</i>	Information for the Joint Review Panel to consider when deciding whether additional information is needed	Rationale information is needed or question Panel should ask from proponent
NDMNRF#35	Section 6.2.9.6.3 Page 6.440	<p><i>“GenPGM has....and a Land Use Permit for the Gate.”</i></p> <p>This Land Use Permit is for a road and gate on Camp 19 road and beyond. The location description is from Km 1.65 opposite Peninsula Road to Bamooos Lake (through mining leases) for a total distance of ~ 12.41km of road. The LUP is also described as starting at Mining Lease 109338.</p>	<p>NDMNRF requires that GenPGM have further discussion with NDMNRF in regards to the Camp19 road. These discussions should include: future use and intent of the road, continued public access of the road (<i>Public Lands Act</i>, Section 49 – Public right of passage) and the establishment of a memorandum of understanding (MOU) in relation to the maintenance, upkeep and responsibility of the road between NDMNRF and GenPGM. It is important to note that any associated infrastructure with Camp 19 road (i.e water crossings) are part of this responsibility to maintain.</p>
<i>Please use as many pages as necessary.</i>			