

GENERATION PGM

October 27, 2022

Via E-Mail - IAAC.Conditions.AEIC@iaac-aeic.gc.ca

Impact Assessment Agency of Canada
160 Elgin Street, 22nd Floor
Ottawa, ON K1A 0H3

To Whom it May Concern:

**Re: Generation PGM ("GenPGM")
Marathon Palladium Project ("Project")
GenPGM Comments on Draft Conditions**

Further to our letter of October 23, 2022, to the Impact Assessment Agency of Canada ("IAAC") regarding our comments on the potential federal environmental assessment conditions for the Project (the "**Draft Conditions**"), we are writing to inform you that after further consultation and consideration, we wish to revise our comment in respect of Condition 6.4 to replace the references to 8 months with 3 months, as follows:

The Proponent shall immediately initiate the development of a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on the health of Indigenous Peoples caused by changes to air quality. The Proponent shall develop this follow-up program, as soon as possible, and in any event not later than ~~8~~3 months following the commencement of construction, ~~and~~ in consultation with Biigtigong Nishnaabeg, other Indigenous groups, Environment and Climate Change Canada, Ontario Ministry of Environment, Conservation and Parks and other relevant authorities. Air quality models shall be updated by the Proponent when exceedances are observed. The Proponent shall implement the follow-up program as soon as possible, and in any event not later than ~~8~~3 months following the commencement of construction, and continuing until the end of decommissioning. As part of the follow-up program, the Proponent shall:

I wish to reiterate that our suggested amendments to the Draft Conditions related to the timing of all actions and deliverables prior to and after commencement of construction (as defined in the Conditions), in particular in respect of Draft Conditions 5.2, 5.3 and 6.4 and 6.4.3, is critical to the viability of the Project.


We have consulted with Biigtigong Nishnaabeg in respect of our suggested amendments to the Draft Conditions and I understand they will separately write to you to express their views in respect to timing of all actions and deliverable prior to and after commencement of construction set out in our comments.

Thank you in advance for your consideration of GenPGM's comments on the Draft Conditions. If you have any questions or concerns, please do not hesitate to contact the undersigned.

Yours truly,

GENERATION PGM INC.

<Original signed by>


Jamie Levy
President, Chief Executive Officer and Director

Cc : Chief Duncan Michano, Biigtigong Nishnaabeg, <email address removed>