



# Marathon Palladium Project Environmental Impact Statement Addendum

## VOLUME 2 OF 2

### 5.0 Consultation and Engagement

Prepared for:

**GENERATIONPGM**

Prepared by:



Date: April 2021

Environmental Assessment by Review Panel under CEAA 2012

Reference Number 54755

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## Abbreviations

BN	Biigtigong Nishnaabeg (formerly Pic River First Nation)
CBA	Community Benefit Agreement
CWB	Community Well-Being
DFO	Fisheries and Oceans Canada
ECCC	Environment and Climate Change Canada
EIS	Environmental Impact Statement
ENDM	Ministry of Energy, Northern Development and Mines
IAAC	Impact Assessment Agency of Canada
LSA	Local Study Area
MECP	Ministry of the Environment, Conservation and Parks
MNO	Superior North Shore Métis Council: Métis Nation of Ontario
MNRF	Ministry of Natural Resources and Forestry
MOU	Memorandum of Understanding
NRCan	Natural Resources Canada
OCIP	Jackfish Métis: Ontario Coalition of Indigenous Peoples
PDAC	Prospectors & Developers Association of Canada
PEDC	Pawgwasheeng Economic Development Corporation
PMFN	Pic Moberg First Nation/Netmizaaggamig Nishnaabeg
PPFN	Pays Plat First Nation/Pawgwasheeng First Nation
RFP	Request for Proposal
ROC	Record of Consultation

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RSA	Regional Study Area
RSMIN	Red Sky Métis Independent Nation
SSA	Site Study Area
TK	Traditional Knowledge
TLRU	Traditional Land and Resource Use
VEC	Valued Ecosystem Component

## 5.0 CONSULTATION AND ENGAGEMENT

### 5.1 INTRODUCTION

GenPGM recognizes the importance of consultation and engagement as an integral aspect of the Project. In the context of this EIS Addendum, 'consultation' refers to two-way communication to share information and viewpoints, understand comments and interests, and address or resolve issues during the planning phase of the Project.

Throughout the preparation of the original EIS (2012) (see Chapter 4 of the original EIS) and in support of preparation of this EIS Addendum, active consultation with Indigenous communities and Project stakeholders (i.e., agencies, members of the public, other interested parties) has influenced Project design, built trust, enhanced understanding of the Project, and informed the assessment of potential environmental effects. Community participation has also informed the Project design through the integration of traditional knowledge (TK) to better understand traditional land and resource uses (TLRU) and to identify components of the environment of importance to the identified Indigenous Groups, which have been incorporated into the Valued Ecosystem Components (VECs) for the Project.

Although consultation with communities regarding this Project dates as far back as 2004, this chapter outlines the Proponent's approach to consultation undertaken since 2014, including key activities undertaken to date, key comments received, responses to concerns and plans for ongoing and future consultation during implementation and monitoring of the Project. The information presented in this chapter is intended to provide an update on consultation and engagement that has occurred since the Joint Review Panel (Panel) process was put on hold through the issuance of the notice to disband the original Panel on October 31, 2014 ([CIAR# 689](#)). Consultation and engagement are an ongoing effort and will continue to take place beyond publication of this report.

Community consultation and engagement on the Project has been ongoing for more than 15 years and is anticipated to continue through the Panel process, permitting and project implementation. This can be categorized into the following four consultation phases (as illustrated in Table 5.1-1):

- **Phase 1: EIS Report and TLRU/TK Studies: (2004-2014):** This phase of consultation was completed to inform the design of the Project and preparation of the original EIS (2012). This phase included capacity funding agreements in place to support TLRU/TK studies and third-party review of the original EIS (2012). It also led to redesign of the Project, specifically relocation of the PSMF discharge from Bamooos Lake to Hare Lake, in order to address concerns with significant adverse environmental effects raised by Indigenous communities and agencies. VECs were identified and impact assessment results were presented. Letters of support were provided by two communities.
- **Phase 2: Exploration Updates and Community Involvement (January 2015 to June 2019):** This phase of consultation focused on information sharing specific to ongoing exploration

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activities, status of the Project and job opportunities. Activities included site tours, community visits, and direct participation in ongoing baseline field studies.

- **Phase 3: EIS Addendum Preparation (June 2019 to April 2021):** This phase of consultation was initiated to support a restart of the Project, specifically the EIS Addendum and anticipated restart of the Panel process. Publications, meetings and information sessions regarding the Project design and schedule, baseline studies, mitigation measures, environmental monitoring and water management planning have taken place. This phase included consultation with government regulators, Indigenous communities, and outreach through news and social media. Several committees were established to share information and allow for comments to be considered and incorporated into the EIS Addendum. Statements of Project support were provided by five communities.
- **Phase 4: Detailed Design and Permitting Consultation (2021 to 2023):** Following submission of the EIS Addendum, consultation with Indigenous communities and Project stakeholders will continue. Planned consultation to identify fish habitat compensation projects, establish water quality discharge objectives, and finalize end land use plans is anticipated. Agreements with communities to support direct participation in report review, environmental monitoring, jobs and contracts will be finalized.

To provide a summary of consultation efforts, results, and future plans specific to each group of participants, this Chapter is organized as follows:

- Section 5.2 – Objectives and Approach
- Section 5.2.2 – Regional Context
- Section 5.2.3 – Indigenous Engagement and Consultation
  - Agreements and Letters of Support
  - Consultation Activities
  - Key Issues
  - Consultation Plan
- Section 5.2.5.8 – Public Consultation
- Section 5.4 – Government Agency Consultation

An updated Record of Consultation (ROC) including the details of specific consultation activities, organized according to Indigenous Groups, the public, and government agencies is provided in Appendix C of this EIS Addendum (Vol 2). Copies of stakeholder consultation lists and meeting agendas, notes, and information materials used in consultation efforts are included in the updated ROC, and summarized in the sections below.

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**Table 5.1-1: Consultation Phases and Project Milestones**

Project Milestones	Pre-2012	2012	2013	2014	2015	2016	2017	2018	2019		2020				2021				2022	2023
									Q1/Q2	Q3/Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4		
<b>Phase 1 – EIS Report and TLRU/TK Studies</b>																				
Conceptual Design and EIS Preparation	█																			
EIS Report Submission		█																		
TLRU and TK Studies Undertaken		█	█																	
Information Requests (IR, SIRs, AIRs)			█																	
Joint Review Panel Hearing (postponed)			█																	
Feasibility Review and Project Hold				█																
<b>Phase 2 - Exploration Updates and Community Involvement</b>																				
On-going Baseline Studies					█	█	█	█	█											
On-going Exploration Activities					█	█	█	█	█											
<b>Phase 3 - EIS Addendum Preparation</b>																				
EA Re-start (GenPGM)									█											
Project Design Update									█	█										
Updated Baseline Reports										█	█	█	█	█						
EIS Addendum Submission														█	★					
<b>Phase 4 – EA, Detailed Design and Permitting Consultation</b>																				
Comment Period														█	█	█	█	█		
Joint Review Panel Hearing and Review															█	█	█	█		
Information Requests																	█	█		
Environment Ministers Decisions																		█	█	
Environmental Permitting																			█	█
Commencement of Project Construction																				█



## 5.2 INDIGENOUS ENGAGEMENT AND CONSULTATION

### 5.2.1 Objectives and Approach

The following sections broadly describe the principles, objectives and approach to consultation and engagement with identified Indigenous Groups taken by GenPGM, building on the consultation principles and objectives outlined in the original EIS (2012). Section 5.2.4 of this report provides details on the consultation methods specific to each community. Key issues identified by each community are summarized in Section 5.2.5. An ROC, including communication logs and information materials, is provided in Appendix C of this EIS Addendum (Vol 2).

#### 5.2.1.1 Overview

Building on the work previously completed by Stillwater, GenPGM has actively engaged with identified Indigenous Groups. GenPGM's consultation plan was designed around obtaining meaningful and substantive input from potentially interested and affected groups, with a vision of developing mutually beneficial and respectful relationships. Consultation and engagement with Indigenous peoples continues to be conducted in accordance with the following principles:

- Fostering a collaborative working relationship with potentially impacted Indigenous communities
- Understanding and recognizing Indigenous rights and interests
- Understanding and respecting the cultural integrity of Indigenous communities
- Fulfilling all delegated obligations to consult
- Mitigating for potential effect and, if not possible, accommodating Indigenous communities
- Developing a broader relationship with interested Indigenous groups

#### 5.2.1.2 Objectives

GenPGM adopts the following objectives when consulting Indigenous communities:

- Promoting effective, proactive, and responsive communications
- Building understanding
- Documenting communications
- Engaging in a timely, meaningful, and transparent consultation process designed to meet the needs and expressed expectations of the Indigenous groups
- Developing and carrying out appropriate commitments
- Seeking formal agreements, where appropriate

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- Mitigating the impacts of COVID-19 by complying with restrictions on community meetings and using other acceptable forms of interaction, such as the introduction of, and expansion in, the use of social media, video conferencing, print and media publications

### 5.2.1.3 Approach

The approach to Indigenous community consultation and engagement is based on the following principles:

- Consulting with federal and provincial governments to confirm Indigenous groups that may be affected by the Project and groups who have asserted or established Aboriginal or treaty rights and to receive guidance on consultation plans and approach, including receiving updates since the original consultation list was established
- Recognizing that consultation with Indigenous communities continues throughout the life of the Project to keep them apprised of ongoing exploration activity; to provide input on environmental, social, and cultural issues; and, to assist the Project team in effective design, permitting, construction, operations, and closure planning/reclamation
- Providing adequate notification to interested Indigenous groups at key Project milestones
- Providing adequate notice of consultation events including by mail, online, public announcements and advertisements, phone calls and e-mails
- Using a variety of consultation methods to inform and engage Indigenous communities. Modifying consultation methods to accommodate public health recommendations
- Recognizing the individual consultation requirements of identified Indigenous groups
- Providing resources and capacity to support identified Indigenous groups in the technical review of EIS Addendum documentation and updates to either TK or TLRU information (or both) previously undertaken for the Project

Traditional and local knowledge accessible to GenPGM and the Project Team was considered in keeping with appropriate ethical standards and without breaching obligations of confidentiality.

### 5.2.1.4 Documentation

In 2021, GenPGM transitioned the Project consultation documentation to a web-based information management system called StakeTracker. This system is a purpose-built information management software solution designed to help organizations manage stakeholder communications by recording, documenting, and tracking stakeholder information, communications and interactions, actions, commitments, community investments, grievances, issues, and more.

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The Project Consultation Database contains more than 1,000 communication records and contact information dating back to 2002, with more formal consultation starting in 2004. A ROC detailing communications which took place during Phase 2 and Phase 3 of consultation is provided in Appendix C of this EIS Addendum (Vol 2).

The ROC is organized chronologically, by group and individual Indigenous community. It includes the following information:

- List of stakeholders contacted during the Project, including Indigenous communities
- Summary tables of activities undertaken, including methods and key topics discussed
- Copies of materials presented or published including news briefs, notices, meeting agendas, notes and presentations

### 5.2.1.5 Agreements and Letters of Support

GenPGM is actively engaging with identified Indigenous groups to understand potential impacts to communities and their rights and TLRU/TK, to mitigate negative effects and, where rights and TLRU/TK are impacted and mitigation is not possible, to accommodate through community benefit agreements.

GenPGM has sought agreements and letters of support from identified Indigenous Groups. The nature of these agreements is confidential; however, the goal is to maximize the participation of communities in the environmental assessment process, construction, operation, closure, and reclamation of the Project.

### 5.2.2 Regional Context

As noted above, GenPGM recognizes that an effective and appropriate consultation process depends on an accurate understanding of the historic and cultural context of the specific Indigenous peoples that may be affected by the Project.

#### 5.2.2.1 Indigenous Land Use

The Project is located in an area that has been used by Indigenous people since time immemorial as an important link to Lake Superior and the fur trade. This area northeast of Lake Superior is home to the Ojibwe people who are part of a larger cultural group of Indigenous people known as the Anishinaabe, which also includes Odawa and Algonquin peoples.

The Stage 1 and 2 archaeological assessments (Woodland Heritage Services Ltd., 2008 and Ross Archaeological Research Associates, 2009) ([CIAR #227](#)) did not identify archaeological resources within the SSA. The field visits completed in 2008 included a representative of Biigtigong Nishnaabeg (BN) and BN's land use maps available at that time were reviewed prior to completing the assessment. The Stage 1 and 2 assessment completed by Ross Archaeological Research Associates (2009) identified four sites primarily in the LSA on the perimeter of Hare Lake of high archaeological potential, with one in proximity to the SSA where the Hare Lake discharge pipeline is proposed to be located. Depending on the final

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

alignment of the discharge line, further archaeological assessment (i.e., Stage 2) may be completed for high potential areas that will be disturbed prior to construction.

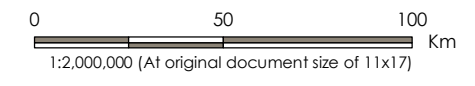
The Project site is located on Crown Lands within the boundaries of the 1850 Robinson-Superior Treaty (the Treaty), as illustrated on Figure 5.2-1. BN has stated that they were not signatories to the Robinson-Superior Treaty and their ancestral land was not ceded, and is subject to a Comprehensive Land Claim by BN which is in active negotiation with the Crown.

V:\0169\active\Other\_PCs\_Active\294 - Marathon\129673006 Marathon PGM\GIS\Map\General\Report\_Figures\ES\129673006\_ES\_Fig06\_2.12\_2\_FstNation\_and\_TreatyMap\_20210407.mxd Revised: 2021-04-07 8:30:00 AM



Legend

-  Site Study Area Location
-  First Nation Community
-  Treaty No. 60, Robinson, Superior, September 7th, 1850 (Ojibwa)
-  Waterbody



- Notes**
1. Coordinate System: NAD 1983 Statistics Canada Lambert
  2. Base features produced under license with the Ontario Ministry of Natural Resources and Forestry © Queen's Printer for Ontario, 2018.
  3. Treaty boundaries adapted from Morris 1943 (1964 reprint). For cartographic representation only.

Project Location: Marathon  
 Prepared by DH on 2021-04-07

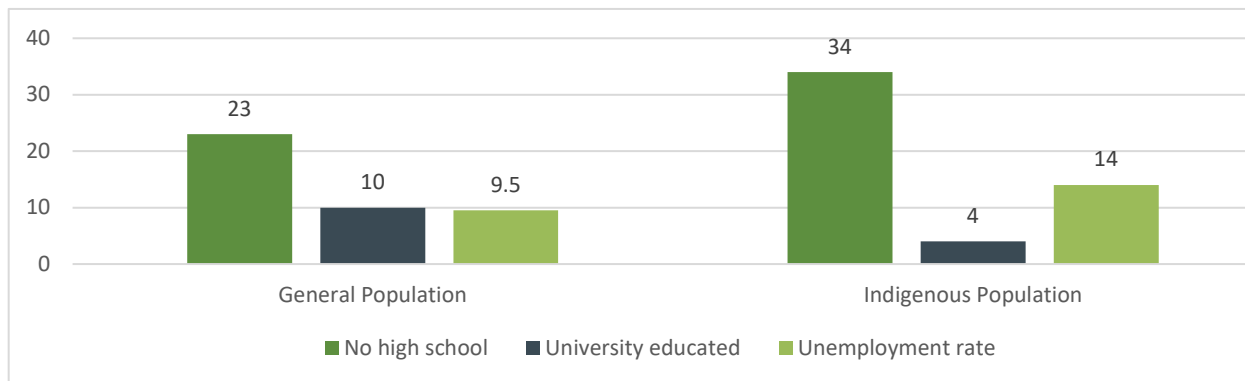
Client/Project:  
 GENERATION PGM INC.  
 MARATHON PALLADIUM PROJECT

Figure No.  
**5.2-1**  
 Title  
**First Nation and Treaty Map**

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5.2.2.2 Regional Demographics

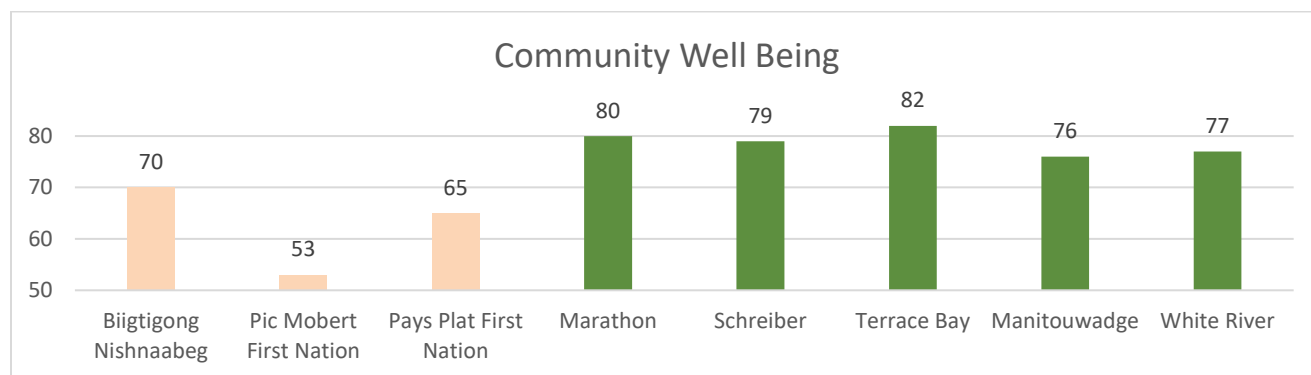
Indigenous people account for approximately 18% of the total available labour force in the socio-economic environment RSA (Stantec 2020g); however, they are generally under-educated and under-employed compared to the general population, as illustrated on Figure 5.2-2.



Source: (Stantec 2020g)

**Figure 5.2-2: Education and Unemployment Levels in Indigenous Communities compared to the General Population within the RSA (%)**

The Community Well-Being (CWB) Index is a method of assessing socio-economic well-being in Canadian communities. Various indicators of socio-economic well-being, including education, labour force activity, income, and housing, are derived from Statistics Canada’s Census of Population and combined to give each community a well-being "score". These scores are used to compare well-being across First Nations and Inuit communities with well-being in other Canadian communities. The well-being of Indigenous communities within the RSA (Figure 5.2-3) are noticeably lower than the levels reported by nearby communities in the RSA.



Source: (Stantec 2020g)

**Figure 5.2-3: Community Well-being in Indigenous Communities compared to Towns within the RSA**

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### 5.2.3 Identified Indigenous Groups

Sixteen Indigenous Groups have been identified by the Crown as having a potential interest in the Project. The list of potentially interested Indigenous Groups was developed by the Crown Consultation Coordinator (Federal and Provincial Representatives) in consultation with communities. Information sharing through the IAAC Registry as well as ongoing notification of Project milestones allows for adaptive management and revisions to the Identified Groups. Figure 5.2-1 illustrates the geographic location of the First Nation communities (Reserves marked by red polygons) in proximity to the Project.

Table 5.2-1 provides the list of identified Indigenous Groups including their approximate distance from and currently understood level of interest in the Project. The level of interest is based on direct communications with each group and with the Crown Consultation Coordinator(s). The level of interest directly influences the level of effort and approach to consultation activities with each group. All communities identified will be provided notification; those with medium or high interest are actively engaged through collaborative committees and those with a high interest have dedicated committees as well as tailored community outreach efforts. Economic opportunities, participation in environmental monitoring and capacity for technical review are extended to those communities with both a medium and high level of interest.

**Table 5.2-1: Identified Indigenous Groups**

Indigenous Groups	Approximate Distance from Project	Level of Interest	Registered Population	Identified Interest	
				2011	2021
Animbiigoo Zaagi'igan Anishinaabek (Lake Nipigon)	150 km	Low	527	Not Interested	
Biinjitiwaabik Zaaging Anishinaabek (Rocky Bay FN)	150 km	Low	767	Not Interested	
Bingwi Neyaashi Anishinaabek (Sandpoint FN)	150 km	Low	331	Not Interested	
Fort William First Nation	225 km	Low	2,599	Not Interested	
Long Lake #58 First Nation	110 km	Low	1,712	Not Interested	
Kiashke Zaaging Anishinaabek (Gull Bay FN)	230 km	Low	1,473	Not Interested	
Red Rock Band	150 km	Low	2,101	Not Interested	
Whitesand First Nation	260 km	Low	1,315	Not Interested	
Ginoogaming First Nation	100 km	Medium	980	Not Interested	X
Jackfish Métis – Ontario Coalition of Indigenous Peoples (OCIP)	60 km	Medium	n/a	X	

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**Table 5.2-1: Identified Indigenous Groups**

Indigenous Groups	Approximate Distance from Project	Level of Interest	Registered Population	Identified Interest	
				2011	2021
Michipicoten First Nation	145 km	Medium	1,217	Not Interested	X
Superior North Shore Métis - MNO	n/a	Medium	n/a	X	
Red Sky Métis Independent Nation - RSMIN	300 km	Medium	8,000*	X	
Biigtigong Nishnaabeg	20 km	High	1,234	X	
Pays Plat First Nation	90 km	High	270	X	
Pic Moberg First Nation	50 km	High/Low	1,053	X	Indicated no further interest-Supports the Project

\* Registered citizens as defined by RSMIN on their website

Six of the seven Indigenous communities that identified an interest in the Project in 2011 continue to have an interest. In 2020, PMFN (also referred to as Netmizaaggamig Nishnaabeg) indicated they had no further interest in the Project, they support the Project and recognize the Project being in BN's exclusive territory. When contacted in January 2021 as part of the EA restart notification, one additional community (Michipicoten First Nation) identified an interest in the Project and a second (Ginoogaming First Nation) stated they would provide a response to IAAC via email. At the time of submitting Volume 2 of this EIS Addendum, no additional responses have been received from the additional communities notified.

### 5.2.3.1 Biigtigong Nishnaabeg

Funding for Biigtigong Nishnaabeg's TLRU study was provided in November 2011. A review of the VECs, with input from 180 BN members and a detailed TLRU study was completed in 2012. A 2007 Memorandum of Understanding (MOU) was renewed in 2012, and an Agreement in Principle was signed in 2013. An Exploration Agreement was signed with BN in 2020.

Capacity funding was provided for the establishment of an Environmental Committee and technical review of the EIS Addendum in 2020. The Environmental Committee continues to meet regularly as do leadership and economic development tables.

An Agreement in Principle was signed between GenPGM and BN in March 2021. The Agreement outlines key opportunities for community benefits including training, jobs, business opportunities and financial participation and outlines the framework for a Community Benefit Agreement (CBA) The Agreement in Principle signals the community leadership's support, in principle, for the Project and the Company's commitment to provide community benefits.



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### 5.2.3.2 Pic Mobert First Nation

An MOU was signed with Pic Mobert in 2008. Funding for their TLRU/TK study was provided in November 2011. The community provided their VECs in April 2012. In 2020, Pic Mobert provided a Letter of Support for the Project and stated that they no longer required direct involvement in the Project, stating the Project was in BN's exclusive territory and identified Biigtigong Nishnaabeg as the lead community.

### 5.2.3.3 Pays Plat First Nation

Funding for TLRU/TK studies was provided in 2011. In 2012, PPFN approved the VECs and TLRU/TK studies were completed in 2013.

Regular meetings have taken place with the Pawgwasheeng Economic Development Corporation (PEDC) throughout 2020 and 2021. A secondary Committee was established in December 2020 to allow for discussions around the EIS Addendum and to provide additional support for community review and participation.

In March 2021, capacity funding was provided to allow for third-party technical review of the EIS Addendum and participation in the Joint Panel Hearings. A Process Agreement is currently under negotiation.

### 5.2.3.4 Red Sky Métis Independent Nation

Red Sky Métis Independent Nation (RSMIN) provided a detailed list and description of VECs by priorities and interests and TLRU/TK studies in 2011. These TLRU studies were provided in confidence; however, the information was considered in the assessment of impacts and development of mitigation measures for the Project. RSMIN engaged AECOM to complete a technical review of the Project Description and feasibility study completed in 2011. In 2020, RSMIN confirmed that the TLRU/TK studies undertaken as part of the original EIS (2012) were sufficient to support the EIS Addendum, and that no additional studies / reviews were required.

RSMIN are currently participating in a collaborative committee with the Town of Marathon and other regional Métis groups as well as undertaking direct discussions with GenPGM about economic development opportunities.

Red Sky Métis Independent Nation have indicated that they remain supportive of the Project and plan to participate in the Joint Panel Hearings, environmental monitoring and economic opportunities.

### 5.2.3.5 Superior North Shore Métis Council - MNO

Funding for TLRU/TK studies was provided to the Métis Nation of Ontario (MNO) in 2011. The MNO provided their VECs list in 2011, completed their TLRU/TK studies in 2012, and retained Eagle Sun Consulting to complete a technical review of the original EIS (2012) in 2013.

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MNO has an active Consultation Committee for Region 2. Project update meetings take place quarterly or as needed. The negotiation of a Letter of Intent is currently underway with the MNO to provide for updated TLRU studies, committee meetings, community outreach, and future negotiation of education, employment, business opportunities and cultural support.

The community of Superior North Shore Métis Council and MNO Region 2 Consultation Committee have indicated they are in support of the Project as long as GenPGM continues to work with the community and committee to address their concerns and accommodate impacts that cannot be mitigated.

### 5.2.3.6 Jackfish Métis - OCIP

GenPGM provided capacity funding for the Jackfish Métis (OCIP) to undertake a technical review of the Project. The Jackfish Métis provided comments on TLRU and VECs in 2011. A Letter of Support and technical review with comments on the original EIS (2012) were provided in 2012. Jackfish Métis are currently participating in the collaborative committee, scheduled to meet monthly for regular project updates.

The Jackfish Métis have indicated that they remain supportive of the Project and plan to participate in the Joint Panel Hearings, environmental monitoring, and economic opportunities.

## 5.2.4 Indigenous Engagement Activities

The following section provides a summary of activities undertaken throughout the four identified consultation phases. Activities are organized around key milestones and topics of importance identified by communities. An overall summary by community is also provided. Further details are included in the ROC (Appendix C of this EIS Addendum [Vol 2]).

### 5.2.4.1 Phase 1: EIS Report and TLRU/TK Studies (2004-2014)

This phase formed the foundation of the consultation activities and included the direct collection of TLRU information by six identified Indigenous groups. This information was used to inform the Project's effects Assessment (Chapter 6 of the original EIS [2012]), Process Solids Management Facility and Mine Rock Alternatives Assessment and directly influenced the Project design.

A technical review of the original EIS (2012) was undertaken to varying degrees by all six identified Indigenous groups who provided written or oral reports to the Joint Review Panel in 2013. A detailed ROC for Phase 1 of the Consultation is provided in Chapter 4 and Appendix 3 of the original EIS (2012).

Six Indigenous communities (BN, PMFN, PPFN, RSMIN, MNO (Superior North Shore) and OCIP) have participated in the Project since the commencement of the EA in 2010. These communities provided documents that contributed to the development of the original EIS (2012) which were used to inform the preparation of this EIS Addendum.

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It is noted that some communities have shared TLRU/TK studies and technical reports with GenPGM for public disclosure; however, through deduction, publication of this information has the potential to jeopardize the confidentiality of information of other communities who want their information protected. For these reasons, traditional information provided has been reviewed and incorporated into the EIS Addendum; however, explicit details are not included, nor are communities identified.

GenPGM has confirmed that BN, PMFN, RSMIN and OCIP will not be providing any updates to TLRU/TK studies or VECs used to assess potential impacts to their communities. It is understood that MNO and PPFN may provide updates in 2021.

### 5.2.4.2 Phase 2: Exploration Updates and Community Involvement (2015-2019)

During the Phase 2 consultation period, when the Project was on hold, the Proponent maintained relationships with and continued to keep Indigenous groups informed of the exploration activities, Project status updates, and baseline environmental field work being completed.

**Winter:** Draft workplan was provided at the start of the year and opportunities for training, employment, and participation in site tours/sampling at the Project and exploration sites were discussed.

**Spring:** Prior to the start of each field work season, a finalized workplan was reviewed and confirmed with the community. Discussed training and employment opportunities for summer season.

**Summer:** Site tours and opportunities to participate in fieldwork on the Project site and in exploration areas were offered annually near the end of the summer season.

**Fall:** In the fall of each year, the Proponent reviewed the work completed, the results of the work, and the reclamation of disturbed areas. Job postings and other business/contract opportunities were provided to the community.

Additionally, the Proponent offered to speak at community events and in schools on the topics of mining, exploration and permitting. Detailed tables of consultation activities undertaken in Phase 2 are provided in the ROC (Appendix C of this EIS Addendum [Vol 2]).

### 5.2.4.3 Phase 3: EIS Addendum Preparation (2019-2021)

During Phase 3 consultation, the EA process was re-started culminating in the preparation of this EIS Addendum. GenPGM continued to work with the six identified Indigenous groups and modified engagement activities to mitigate the impacts of the COVID-19 pandemic restrictions through the introduction of, and expansion in, the use of social media, video conferencing, print and media publications. Environmental Committees were established to share information about Project design changes, the EA process, baseline study updates, mitigation measures and monitoring plans. Discussions also included opportunities for direct and indirect economic benefits.

Information sharing has been provided directly by email and through virtual meetings with band staff and elected councilors as well as virtual community information sessions for the membership. Information was

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also made available through regular newspaper publications, the IAAC Registry and the GenPGM website.

### 5.2.4.3.1 Information Sessions

Three public information sessions, held on the BN Reserve, took place in August and September 2020. A virtual information session was also held with BN in October and November 2020. In January and March 2021, virtual information sessions were held with a collaborative committee including Métis community members and Town of Marathon representatives.

A summary of the information sessions is provided in Table 5.2-2 and copies of information materials are provided in the ROC (Appendix C of this EIS Addendum [Vol 2]). These sessions provided information about identified VECs and confirmed local use of the Project site.

At the face-to-face sessions, the optimized Project design was presented, and the environmental assessment process was explained. A slide show of the poster boards was displayed with a projector and screen. A catalytic converter and copper wire, copper piping and rock samples were also displayed.

These sessions were advertised on local radio and newspaper. Direct email invitations, including copies of the display boards were also provided to all Indigenous groups one week prior to the events. Detailed questions and comments recorded during the sessions and follow-up are provided in the ROC (Appendix C of this EIS Addendum [Vol 2]).

**Table 5.2-2: Information Sessions**

Activity	Date and Time	Key Comments
Drop-In Session at BN Band Office	August 12, 2020 9am to 12pm	<ul style="list-style-type: none"> <li>Jobs and Training</li> <li>Community benefits</li> <li>Water management</li> </ul>
	September 22, 2020 3pm to 6pm	<ul style="list-style-type: none"> <li>Project design</li> <li>Water management</li> <li>Jobs and contracts</li> <li>Closure planning</li> </ul>
	September 23, 2020 9am to 12pm	<ul style="list-style-type: none"> <li>Jobs and contracts</li> <li>Education and training</li> </ul>
Virtual Information session with BN	October 2020	<ul style="list-style-type: none"> <li>Project Design and Schedule</li> </ul>
Virtual Information session with BN	November 2020	<ul style="list-style-type: none"> <li>Baseline Reports</li> </ul>
Virtual information session with collaborative committee	January 26, 2021	<ul style="list-style-type: none"> <li>Project Design and Schedule</li> <li>Baseline Report</li> </ul>

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Activity	Date and Time	Key Comments
Virtual information session with collaborative committee	March 10, 2021	<ul style="list-style-type: none"> <li>• Feasibility Study</li> <li>• Project Schedule</li> <li>• Water Management</li> </ul>

### 5.2.4.3.2 Report Sharing

Report sharing is a key component of consultation, to allow for technical review and ongoing comments on Project design, mitigation, and monitoring. A number of reports have been published throughout Project consultation and shared with communities through the formal IAAC Registry website. Communities receive notices of key milestones, and a compilation of key documents can be found on the IAAC Registry ([CIAR #728](#)).

Draft versions of technical reports have also been made available for technical review by Indigenous groups through temporary file sharing sites. Sharing draft reports with communities prior to formal submission to IAAC allows Indigenous groups to provide comments and actively participate in finalizing the EIS Addendum and supporting documents.

When reports are finalized, electronic copies are published on the GenPGM website and are also loaded onto thumb drives and mailed directly to identified Indigenous Groups to ensure access for those individuals with difficulty in accessing reports from the internet. Once posted to the registry, the EIS Addendum and supporting baseline update and technical studies will be available to all Indigenous communities for review and comment, which GenPGM will treat as part of on-going consultation activities.

### 5.2.4.3.3 Proponent-Led Committees

A number of committees have been formed with identified Indigenous groups to allow for discussion around the EIS Addendum, baseline reports, effects assessment and mitigation measures. GenPGM's goal is to foster collaboration wherever possible, including seeking direct community participation in environmental management and monitoring. A summary of the established committees is provided in Table 5.2-3 to Table 5.2-6. GenPGM's long-term goal is to reduce the number of committees and work together under one collaborative regional environmental committee.

**BN:** EIS review includes representatives from elected councilors, sustainable development staff and third-party consultants. Discussions around community benefits are also underway.

**Table 5.2-3: BN Engagement Committee Meetings Summary**

Date	Participants	Topics Discussed
Nov 13, 2020	BN staff and councilors SVS (community consultant)	<ul style="list-style-type: none"> <li>• Baseline Studies</li> </ul>
Jan 5, 2021	BN Chief and councilors Legal Counsel	<ul style="list-style-type: none"> <li>• Community Benefits</li> <li>• Project Design and schedule</li> </ul>

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**Table 5.2-3: BN Engagement Committee Meetings Summary**

Date	Participants	Topics Discussed
Jan 19, 2021	BN Chief and councilors	<ul style="list-style-type: none"> <li>Jobs and Contracts</li> </ul>
Jan 28, 2021	BN staff and councilors SVS (community consultant)	<ul style="list-style-type: none"> <li>Water Quality</li> <li>Mitigation measures</li> <li>Monitoring plans</li> </ul>
Feb 22, 2021	BN staff and councilors SVS (community consultant)	<ul style="list-style-type: none"> <li>Mitigation measures</li> <li>Monitoring plans</li> </ul>

**PPFN:** Includes economic development and environment. Representatives from administration and elected council members.

**Table 5.2-4: PPFN Engagement Committee Meetings Summary**

Date	Participants	Topics Discussed
Jan 19, 2021	PPFN staff and councilors Legal counsel	<ul style="list-style-type: none"> <li>Project Design</li> <li>Exploration</li> <li>EIS Report</li> </ul>
Feb 18, 2021	PPFN staff and councilors Legal counsel	<ul style="list-style-type: none"> <li>Consultation Process</li> <li>EIS Report</li> <li>Technical Review</li> <li>Community Benefits</li> </ul>

**MNO Region 2:** Includes Captain of the Hunt, Regional Councilor, local Presidents and MNO staff. Consultation committee to be provided regular Project updates.

**Table 5.2-5: MNO Engagement Committee Meetings Summary**

Date	Participants	Topics Discussed
July 2020	Staff, Captain of the Hunt, and regional presidents	<ul style="list-style-type: none"> <li>Project Design and Schedule</li> <li>Field work and baseline studies</li> </ul>
Feb 2, 2021	Staff, Captain of the Hunt, and regional presidents	<ul style="list-style-type: none"> <li>Project Design and Schedule</li> <li>Exploration</li> <li>Traditional Land Use</li> </ul>
April 2021 (planned)	Staff, Captain of the Hunt, and regional presidents	<ul style="list-style-type: none"> <li>Agreement in Principle</li> <li>Consultation Plan</li> <li>Water Management</li> </ul>

**Collaborative Committee:** Information sessions provided to interested members of Métis communities (Superior Northshore, Jackfish, Red Sky) and Town officials.

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**Table 5.2-6: Collaborative Committee Meetings Summary**

Date	Participants	Topics Discussed
Jan 26, 2021	Red Sky Métis Jackfish Métis Superior North Shore Métis Town of Marathon	<ul style="list-style-type: none"> <li>• Project Update</li> <li>• Baseline Reports</li> <li>• Mitigation Measures and</li> <li>• Environmental Monitoring</li> </ul>
March 10, 2021	Red Sky Métis Jackfish Métis Superior North Shore Métis Town of Marathon	<ul style="list-style-type: none"> <li>• Feasibility Study</li> <li>• Water Management</li> </ul>
April 2021 (planned)	TBD	<ul style="list-style-type: none"> <li>• Closure Planning</li> </ul>

### 5.2.4.3.4 Government-Led Discussion Forums

The Crown has a duty to consult Indigenous communities when it has knowledge of established or asserted Indigenous or treaty rights that might be adversely affected by its decision or action. Although the ultimate responsibility for consultation rests with the Crown, certain procedural aspects of this consultation may be delegated to project proponents. While GenPGM has undertaken consultation in this regard, they have also cooperated and participated with the Crown in their consultation with Indigenous communities.

The Crown Consultation Coordinator through IAAC has organized a number of discussions with identified Indigenous Groups to inform their process and decision making. GenPGM has participated in a number of these meetings to facilitate discussions around Project design and planning. A summary of meetings undertaken to date is provided in Table 5.2-7 below.

**Table 5.2-7: Government Discussion Forums**

Date	Participants	Topics Discussed
Nov 23, 2020	IAAC MECP+ ENDM Red Sky Independent Métis	<ul style="list-style-type: none"> <li>• Project Overview</li> <li>• Government Process</li> </ul>
Nov 26, 2020	IAAC MECP BN	<ul style="list-style-type: none"> <li>• Baseline Updates</li> <li>• Government Process</li> <li>• Project Design</li> <li>• Water Quality</li> </ul>
Dec 3, 2020	IAAC MECP + ENDM Pays Plat First Nation	<ul style="list-style-type: none"> <li>• Project Overview</li> <li>• Government Process</li> <li>• Fish and Fish Habitat</li> <li>• Water Quality</li> </ul>
Jan 27, 2021	IAAC MECP + ENDM	<ul style="list-style-type: none"> <li>• Project update</li> <li>• Emergency planning</li> <li>• Species at risk</li> </ul>

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**Table 5.2-7: Government Discussion Forums**

Date	Participants	Topics Discussed
	Red Sky Independent Métis	
Jan 28, 2021	IAAC MECP + ENDM Superior Northshore Métis	<ul style="list-style-type: none"> <li>• Project update</li> <li>• Community benefits</li> <li>• Education and training</li> </ul>
Feb 12, 2021	IAAC MECP + ENDM Michipicoten First Nation	<ul style="list-style-type: none"> <li>• Project Design and Schedule</li> <li>• EA Process</li> <li>• Project Ownership</li> <li>• Baseline Studies</li> <li>• Water Quality</li> <li>• Species at Risk</li> <li>• Government Process</li> </ul>
Feb 17, 2021	IAAC MECP + ENDM Jackfish Métis	<ul style="list-style-type: none"> <li>• Consultation Process</li> <li>• Closure Planning</li> <li>• Water and Fish</li> <li>• Road Safety</li> </ul>
Feb 25, 2021	IAAC, ECCC, MECP, MNRF, ENDM, DFO Biigtigong Nishnaabeg	<ul style="list-style-type: none"> <li>• Aboriginal Rights</li> <li>• Land and Resources Use</li> <li>• Cumulative Effects</li> <li>• Mitigation Measures</li> </ul>

### 5.2.4.3.5 Summary of Community-Specific Indigenous Consultation

#### *Biigtigong Nishnaabeg (BN)*

During Phase 3, BN and GenPGM formed a committee which held regular meetings (12). BN continued to be updated on exploration, jobs and contracting opportunities. Two face-to-face information sessions were held in the community and two virtual information sessions were held due to public health restrictions.

Report sharing of updated baselines studies, Volume 1 of the EIS Addendum, and chapters on Mitigation and Monitoring were undertaken during Phase 3. Capacity funding was provided to facilitate meetings and technical review. Collaboration with government regulators was undertaken through combined discussions. BN provided comments on baseline studies, mitigation measures, environmental monitoring and the commitments list which were considered and addressed.

BN and GenPGM have formalized an engagement approach that includes regular calls with community leaders, as needed, and the formation of a subcommittee tasked with discussing opportunities and reviewing and sharing of information. An Agreement in Principle was signed and supported by a Band Council Resolution as an indication of the community leadership's support, in principle, for the Project. The Agreement outlines the framework for a Community Benefit Agreement (CBA), community benefits including training, jobs, business opportunities and financial participation.



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Additional meetings with BN occurred in March 2021 to obtain additional information in regard to socio-economic conditions within the BN community, specifically in regard to infrastructure (water, sewage, education) and community services (health care, daycare). Further discussions with BN were held to present preliminary results of the assessment on socio-economic, indigenous considerations and cumulative effects in April 2021. Consideration of the comments received during these meetings were incorporated into the final assessment, with copies of relevant meeting notes provided in the Record of Consultation (Appendix C of the EIS Addendum [Vol. 2]).

A summary of key consultation and engagement activities with BN completed during Phase 1 is provided in the original EIS (2012). Details on Phase 2 and Phase 3 consultation activities are provided in the ROC included as Appendix C of this EIS Addendum (Vol 2). A summary of comments and feedback received throughout the consultation process pertaining to BN is provided in EIS Addendum (Vol 2) Section 6.2.12.3.2.

### *Pic Moberg First Nation (PMFN)*

In June 2020, prior to the Panel process officially restarting, PMFN provided a letter authorized by Band Council Resolution supporting the Project. The letter stated that the Project footprint is located within Biigtigong Nishnaabeg's asserted exclusive territory and PMFN is not impacted by the project footprint; therefore, the community did not require further consultation.

GenPGM continues to notify PMFN of key milestones throughout the EIS Process.

A summary of key consultation and engagement activities with PMFN, including a copy of the Letter of Support, is included in the ROC (Appendix C of this EIS Addendum [Vol 2]).

### *Pays Plat First Nation (PPFN)*

Phase 3 of consultation with PPFN included an exchange of formal letters around Project ownership, capacity funding and the consultation process. GenPGM reached out to PPFN to provide a Project update and develop a consultation plan in May 2020, at which point communication was directed through PPFN legal counsel. A committee was formed in late 2020 and two committee meetings have been held as of March 2021. One virtual community meeting was held in December 2020 with 18 representatives from the community, the government, and the Proponent in attendance.

GenPGM is working directly with the Pawgwasheeng Economic Development Corporation (PEDC) to identify economic and community opportunities. PEDC work includes meetings and information exchange around contracts and joint venture partnerships.

In a November 2020 Letter to the Panel in [\(CIAR #723\)](#), PPFN identified several environmental and cultural concerns with the Project based on their review of the original EIS (2012). The review recommended the process be suspended until which time the community was able to fully review the revised Project description.

In March 2021, GenPGM provided capacity funding for PPFN to undertake third-party technical review of the EIS Addendum, including collaboration opportunities and panel participation.

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A summary of key consultation and engagement activities with PPFN completed during Phase 2 and 3 is provided in the ROC (Appendix C of this EIS Addendum [Vol 2]).

### *Red Sky Métis Independent Nation (RSMIN)*

In 2020, RSMIN confirmed that the studies undertaken as part of the original EIS (2012) were sufficient to support the EIS Addendum, and that no additional studies / reviews were required.

RSMIN has indicated that they remain supportive of the Project and are seeking participation in the Joint Panel Hearings, environmental monitoring and in economic opportunities. They intend to complete a review and provide feedback on the EIS Addendum and supporting documentation through their internal experts.

### *Jackfish Métis (OCIP)*

The Jackfish Métis continue to be involved in the EA process and, to date, are supportive of the Project. They intend to complete a review and provide feedback on the EIS Addendum and supporting documentation through their internal experts.

### *Superior North Shore Métis (MNO)*

GenPGM has undertaken ongoing consultation with the Superior North Shore Métis Council, the Region 2 Consultation Committee, and the MNO throughout Phase 3.

During this consultation, the MNO indicated that there may be a need to update the 2012 TLRU Studies. GenPGM is committed to supporting MNO with their planned land use work.

Superior North Shore Métis Council and the Region 2 Consultation Committee indicated that they remain supportive of the Project and both parties are committed to signing a Letter of Intent in 2021 which will lead to a community benefit agreement.

### *Michipicoten First Nation*

In February 2021, IAAC sent a Notice of the Amended Terms of Reference for the Project to an additional ten Indigenous Groups that may be affected by the Project or who have asserted or established Aboriginal or treaty rights ([CIAR #731](#)). Michipicoten replied to the Notice stating their interest in participating in the EIS process and Joint Review Panel.

An introductory meeting and information session took place on February 12, 2021 between Michipicoten, government, and GenPGM to outline the EIS Process, understand community concerns and provide a Project update. The discussion revolved around project details, schedule, endangered species, and water quality. Michipicoten have received government funding to participate in the Joint Review Panel.

### *Ginoogaming First Nation*

In February 2021, IAAC sent a Notice of the Amended Terms of Reference for the Project to an additional ten Indigenous Groups that may be affected by the Project or who have asserted or established

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Aboriginal or treaty rights ([CIAR #731](#)). Ginoogaming replied to the Notice stating their intention to provide comments to the Panel. No further correspondence has taken place.

### 5.2.4.4 Phase 4: Detailed Design and Permitting Consultation (2021 to 2023)

As part of Phase 4 Consultation, GenPGM is committed to ongoing consultation beyond EA approval and throughout the environmental permitting process. The overall objective of Phase 4 Consultation is to seek support from identified Indigenous groups on required permits, mitigation measures and the environmental monitoring approach. Information sharing will occur through a variety of methods and will be focused on promoting the following key values.

**Indigenous Culture:** Continue to inform the Project detailed design through consideration of TLRU/TK reports provided by Indigenous communities. Invest in cultural practices and seasonal ceremonies. Undertake cultural sensitivity training for Company leadership and workforce.

**Safe Land and Resource Access:** Where safe to do so, maintain access to important roads and lakes. Implement a country foods monitoring program, to measure long-term health of local fish.

**Training and Education:** Offer education and training programs to build capacity and increase employability and job ready skills. Proactively seek employment opportunities for local Indigenous community members.

**Jobs and Contracts:** Seek active community participation in environmental monitoring at site. Work with Indigenous economic development groups to increase contracting opportunities for local Indigenous businesses.

**Environmental Protection:** Establish a joint sustainability committee with representation from identified Indigenous groups and the Town of Marathon. Undertake environmental projects with direct community interests and support.

Phase 4 of Project consultation will include a series of collaborative committee meetings, as well as associated plain language information which will be developed and held throughout the spring and summer of 2021 as outlined in Table 5.2-8.

**Table 5.2-8: Collaborative Committee Meetings**

Date	Topics Discussed
March 10, 2021	Water Management
April 14, 2021 (planned)	Closure Planning
May 12, 2021 (planned)	Fish and Fish Habitat
June 9, 2021 (planned)	Species at Risk

The following key milestones are identified for Phase 4 of Project consultation:

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- **Panel Review and Information Requests:** A Crown consultation report will be prepared by government and provided to the Joint Panel to inform their review. Third-party technical reviewers and community members may also choose to participate in the Joint Review Panel hearing process and by providing formal written comments and information requests.

Active engagement with those communities who provide information requests with specific concerns will be undertaken with the goal of achieving consensus on the Project design which will allow for the most robust protection of the environment and maximum benefit to communities.

- **Panel Hearings:** Public hearings will be offered in person, virtually or a combination of both. The government will ensure communities who are interested in the Project will have access to the hearings. Hearing procedures will be developed, that include a form of confidentiality agreement and protocol that will give Indigenous communities an opportunity to present sensitive information to the Panel, protecting disclosure of that information from other communities and federal and provincial governments. Communities will have an opportunity to present their TLRU/TK studies directly to the Panel who will ensure confidentiality of the material.
- **Closure Planning:** The EIS Addendum includes a conceptual closure plan (see Section 1.5.2.3 of the EIS Addendum [Vol 1]) ([CIAR #727](#)): however, prior to construction, a Closure Plan must be filed with ENDM in accordance with O. Reg. 240/00. The Plan will include a comprehensive cost estimate that will inform the required closure bond to be posted by GenPGM to allow for closure and rehabilitation activities.

Identified Indigenous groups will be invited to directly participate in closure planning through information sharing and direct participation in selection of long-term reclamation projects and planning.

- **Fisheries Offset Authorization:** The Project will result in a harmful alteration, disruption, and destruction of fish habitat (HADD), which will require Authorization from DFO under Section 35(2) of the *Fisheries Act* and Section 27.1 of the MDMER. The fish and fish habitat offsetting plan has been included as Appendix D6 of this EIS Addendum (Vol 2). The planning and design of the final offsetting plan will include consideration of Indigenous values. GenPGM is committed to investing a portion of the fish habitat offsetting efforts directly into community-led projects. Direct participation opportunities will also be made available in selection and execution of on-site fish habitat creation projects, as well as undertaking ceremonies prior to fish relocation.
- **Industrial Sewage Discharge Approval:** The Project requires an Environmental Compliance Approval (ECA) for industrial sewage for discharge into Hare Lake. GenPGM is committed to the protection of regional water quality and will implement active water treatment prior to discharge. Community review of water management plans and participation in water quality monitoring is planned.

Identified milestones are tied to community interests, regulatory approvals and Project design decisions. GenPGM is dedicated to seeking support from communities for permit applications and environmental management strategies around these specific milestones and permits through transparent information sharing, active engagement and ongoing adaptive management.

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## 5.2.5 Key Issues and Responses

A number of key issues have been identified throughout consultation. The following tables provide a summary of comment and response by community.

### 5.2.5.1 Biigtigong Nishnaabeg

Key issues raised by BN throughout consultation for the Project are summarized in Table 5.2-9.

**Table 5.2-9: Key Issues and Responses to BN**

Topic	BN Comments	Proponent Response
Accidents and Malfunctions	<p>Request for information on:</p> <ul style="list-style-type: none"> <li>whether cyanide is being used and how spills will be mitigated</li> <li>dam failures and mitigation community considerations in the event of an accident</li> <li>Noted importance of considering effects on Pic River given the important community value of the river.</li> </ul>	<p>A Waste and Recycling Material Management Program (WRMMP) will form part of the Environmental Management Program for the Project, which is discussed in Chapter 7 of this EIS Addendum (Vol 2). The WRMMP will include a hazardous waste plan, identifying procedures for the safe collection, storage, separation, and fate of hazardous materials. Cyanide is not part of the planned process on-site.</p> <p>Section 6.3 of this EIS Addendum (Vol 2) includes considerations of environmental, social and economic impacts of potential accidents or malfunctions, including the structural failure of the PSMF and/or MRSA.</p> <p>Consideration for the protection of the Pic River has been incorporated into the design of the Project and throughout the assessment of effects, particularly relating to effects on water quality and quantity (Section 6.2.3 of this EIS Addendum [Vol 2]) and Indigenous considerations (Section 6.2.12 of this EIS Addendum [Vol 2]). The PSMF continues to discharge into Hare Lake to avoid potential release of contaminated waters to the Pic River.</p>
Atmospheric and Acoustic Environment	<p>Request for information on the selection of air quality and noise monitoring locations and zones of influence.</p>	<p>Existing air quality stations are identified in the Air Quality Updated Baseline Report (Stantec, 2020b). The location of special receptors to determine potential effects of changes in air quality and noise will be identified in the Air Quality Updated Effects Assessment (Appendix D1 of this EIS Addendum [Vol 2]) and Noise Updated Effects Assessment (Appendix D2 of this EIS Addendum [Vol 2]). Refinements to the LSA for air quality and the LSA for noise have considered potential zones of influence from the Project.</p>
Closure/ remediation	<p>Request for information on the remediation of the site including:</p> <ul style="list-style-type: none"> <li>Remediation of PSMF and associated dam</li> <li>Remediation of pits into productive lakes</li> </ul>	<p>A conceptual description of the closure plan is provided in Section 1.5.2.3 of the EIS Addendum (Vol 1) (<a href="#">CIAR #727</a>) and is illustrated on Figures 1.5-3; 1.5-4 and 1.5-5 of that report.</p> <p>The closure plan will be completed in accordance with O. Reg 240/00 and will focus on returning the site to a naturalized condition that supports use by Indigenous communities in a manner that is supported by safety regulations, where feasible.</p> <p>The PSMF and storm water pond will be reclaimed and restored into potential fish habitat. The South and Central Pits will be filled with mine rock and process solids upon mine closure, while the North Pit will be filled with water as potential fish habitat.</p>

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**Table 5.2-9: Key Issues and Responses to BN**

Topic	BN Comments	Proponent Response
Consultation	<p>Request for community consultation to ensure that TK and TLRU (confidential) is incorporated into the EIS Addendum and supporting technical studies.</p> <p>Request for the inclusion of community monitoring during site development and operation.</p>	<p>Specific TLRU/TK information has been included within the EIS Addendum, however details on locations, community and other references that could disclose the source of TLRU/TK are excluded to ensure confidentiality.</p> <p>A comprehensive list of VECs was provided by BN in March 2012 and TLRU/TK studies in January 2012 and June 2012. This information has been used to inform both the characterization of baseline conditions, the effects assessments, and the selection of VECs. Chapter 6 of this EIS Addendum (Vol 2) provides detail on the assessment of Project-related effects on each VEC.</p> <p>GenPGM is committed to working with Indigenous communities, such as BN, to identify and explore future opportunities to explain specifically how TLRU/TK information was considered in the assessment.</p>
Cultural heritage	<p>Request for information on the protocols if there is contact with cultural artifacts or burial grounds.</p>	<p>A cultural protection protocol, including the immediate suspension of work, will be put in place. Additional details on the protocol are provided in Section 6.2.11 and 7.3 of this EIS Addendum (Vol 2).</p>
Cumulative effects	<p>Request information on what other projects are being included in the cumulative effects assessment.</p>	<p>The Cumulative Effects assessment is detailed in Section 6.6 of this EIS Addendum (Vol 2). The assessment is based on a Project Inclusion List (PIL) list made up of future projects and activities that are reasonably foreseeable are defined as those that; (a) have been publicly announced with a defined project execution period and with sufficient project details that allow for a meaningful assessment, (b) are currently undergoing an environmental assessment or, (c) are in a permitting process.</p>
EA / approvals process	<p>Request for information on:</p> <ul style="list-style-type: none"> <li>• timing for release of documents</li> <li>• permitting and other regulatory requirements</li> </ul>	<p>GenPGM worked with BN and their consultant (SVS Consulting) to review draft updated baseline conditions reports prior to submission to IAAC. Comments received from BN were addressed and considered in the completion of these reports.</p> <p>GenPGM has committed to ongoing consultation throughout the life of the Project, as part of the Joint Review Panel hearing process, during detailed design and permitting, mine operations, and decommissioning and closure to provide opportunities for meaningful dialogue and feedback.</p>
Fish and Fish Habitat	<p>Noted fish species of interest to the community.</p>	<p>Consideration of fish species of importance to Indigenous communities were included in the Aquatic Environment Baseline Report Update (Ecometrix, 2020b) (<a href="#">CIAR # 722</a>), including identification of presence / absence within waters potentially affected by the Project.</p> <p>The VEC assessment for fish and fish habitat, in Section 6.2.4 of this EIS Addendum (Vol 2), discusses the potential effect of the Project on these species. The consumption of fish is also considered in the Human Health Risk Assessment that is included in 6.2.10 of this EIS Addendum (Vol 2). Consideration of impacts on fish species of importance to Indigenous communities will inform the determination of significance of Project-related effects.</p>
Groundwater	<p>Request for information on:</p>	<p>Groundwater analytical results and a description of overburden groundwater quality are provided in the Environmental</p>

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**Table 5.2-9: Key Issues and Responses to BN**

Topic	BN Comments	Proponent Response
	<ul style="list-style-type: none"> <li>• The type of chemicals present within contact water and waste rock</li> <li>• The mitigation measures to store Type 2 material</li> <li>• The mitigation measures to prevent seepage of contaminated water</li> </ul>	<p>Hydrogeology Updated Baseline Report (Stantec, 2020e) (<a href="#">CIAR # 722</a>).</p> <p>The steep topography on site plays a strong role in constraining groundwater movement and defining watershed boundaries. The Project design has been planned to fit within Subwatersheds 101, 102, 103, 105, and 106, and to remain outside of Subwatershed 109, away from drinking wells and the groundwater protection zone.</p> <p>Information regarding the management of Type 2 mine rock and process solids is provided in Sections 1.5.4.5 and 1.5.4.6 of EIS Addendum (Vol 1) (<a href="#">CIAR #727</a>), and is further covered in Section 6.2.3 of this EIS Addendum (Vol 2), which discusses mitigation measures to protect water from Type 2 materials (i.e., PSMF, below water storage, water treatment).</p> <p>A series of seepage collection basins have been incorporated into the design of the PSMF to reduce potential seepage of contaminated water (see Section 1.5.4.8 of EIS Addendum Vol 1). Section 6.3 of this EIS Addendum (Vol 2) includes an assessment of potential accidents and malfunctions, including a scenario for unanticipated seepage from the PSMF and MRSA.</p>
Labour, Education and Economy	<p>Request for information on:</p> <ul style="list-style-type: none"> <li>• Number of employment opportunities</li> <li>• Types of employment opportunities, including whether there will be full time or contract positions</li> <li>• Training and education required for employment</li> <li>• Training opportunities</li> <li>• Opportunities for youth and education materials about future careers</li> <li>• Contracting opportunities (e.g., tree removal, earth works, etc.)</li> <li>• Business opportunities at closure</li> </ul> <p>Noted that there are opportunities for community businesses to provide services and supplies throughout the life of the mine.</p>	<p>A workforce of approximately 900 workers will be required during site preparation and construction and that approximately 375 workers will be required for mine operation (see Section 1.5.2.2 of EIS Addendum (Vol 1) (<a href="#">CIAR #727</a>).</p> <p>GenPGM and BN have signed an agreement in principle which outlines general objectives around education, contracts and employment.</p>
Project Alternatives	<p>Request for information on:</p> <ul style="list-style-type: none"> <li>• The assessment of lands for highest and best use</li> </ul>	<p>Chapter 3 of EIS Addendum (Vol 1) (<a href="#">CIAR #727</a>) provides an update on the assessment of alternatives to the Project, including alternative means of carrying out the Project.</p>
Project Design	<p>Request for information on:</p> <ul style="list-style-type: none"> <li>• Details on how ore will be processed, including</li> </ul>	<p>The mine design, including the Project components, ore processing and construction, is covered in Section 1.5.4 of EIS Addendum (Vol 1) (<a href="#">CIAR #727</a>), including an update on the type of materials to be mined by the Project, specifically</p>

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**Table 5.2-9: Key Issues and Responses to BN**

Topic	BN Comments	Proponent Response
	<p>chemicals used during processing</p> <ul style="list-style-type: none"> <li>• Details of what materials will be processed on site</li> <li>• The uses for palladium</li> <li>• Explosives storage</li> <li>• Fuel storage</li> <li>• The source of construction materials (e.g., soils, clays, aggregates)</li> <li>• The potential to reuse mine rock as aggregate</li> <li>• Mitigation measures to address existing erosion issues within the SSA (e.g., along Pic River)</li> <li>• Potential future expansions</li> </ul>	<p>palladium, copper and possible concentrates of iron sulfide, magnetite and vanadium. Further information on the design of the Project is provided in Section 1.5.4 of this of EIS Addendum (Vol 1) and has been communicated to BN through a series of project updates.</p> <p>Section 1.5.4.3 of EIS Addendum (Vol 1) includes a list of the primary chemicals/reagents used during processing, which were discussed with the community during the Project update.</p> <p>Section 1.4.1.1.2 of the original EIS (2012), as well as project updates provided to BN, provide a description of the uses of palladium (i.e., catalytic converters for the automobiles and the manufacturing of electronics).</p> <p>GenPGM has included an aggregate plant as part of the Project to generate aggregate for use on-site, using excess mine rock as the source, which could reduce the footprint of the mine rock storage area and provide a long term business opportunity.</p> <p>The primary rationale for revising the location of the road access is to move future mine traffic away from the Pic River (see Section 3.2.2.1 of the EIS Addendum Vol 1), where erosion of the existing road is an environmental concern.</p> <p>Although GenPGM has conducted early exploration activities over the past year, a significant amount of additional exploration will be needed before contemplating the feasibility of future expansions.</p>
Socio-economic – Housing	Request for information on the off-site accommodation complexes, including location.	Off-site accommodations are still being explored, but it is anticipated that such a facility will need to accommodate approximately 250 people. GenPGM has discussed options for the creation of an Accommodations Complex with various groups / individuals to determine an appropriate solution; however, a decision on the location and management of this facility has not yet been confirmed.
Surface Water	<p>Noted increased community interest in water quality protection for subwatersheds affected by the Project that discharge to the Pic River and a desire to limit or prohibit contaminated water (e.g., tailings water) from being able to enter the Pic River watershed.</p> <p>Request for information on:</p> <ul style="list-style-type: none"> <li>• Mitigation measures to protect surface water</li> <li>• Anticipated changes to water quality</li> <li>• Water quality mitigation measures</li> <li>• Details on the water quality monitoring program</li> </ul>	<p>As noted in Section 1.6 of EIS Addendum (Vol 1) (<a href="#">CIAR #727</a>), changes to the Project have been proposed to further reduce potential impacts on the Pic River watershed. This includes reducing potential for contact waters to enter the Pic River, moving infrastructure out of watersheds that drain into the Pic River, and continuing to direct discharge from the PSMF into Hare Lake.</p> <p>Section 6.2.3 of this of EIS Addendum (Vol 2) includes an assessment of effects to water quality and quantity, including a description of changes, mitigation measures, and follow-up and monitoring programs. Additional details on anticipated effects to surface water are assessed in the Surface Water Hydrology Effects Assessment (Appendix D3 of this EIS Addendum [Vol 2]).</p> <p>A commitment to long-term monitoring of potential impacts on surface water as part of the Environmental Monitoring and Management Program (EMMP) is included in Section 7.1.2.3 of this of EIS Addendum (Vol 2). Further details will be developed through the permitting process, which will be scoped based on consideration of input from various sources.</p>



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**Table 5.2-9: Key Issues and Responses to BN**

Topic	BN Comments	Proponent Response
	<ul style="list-style-type: none"> <li>The drainage design within and around the SSA</li> <li>Anticipated changes to water quantity (flow) in adjacent waterbodies (e.g., Pic River).</li> </ul>	
TLRU/TK	<p>Identification of TLRU/TK (confidential) that may be affected by the Project.</p> <p>Request for more details on access restrictions and controls.</p> <p>Noted comment on conducting a traditional ceremony for Project.</p>	<p>Access to the mine site during operation will be limited for safety reasons; however, GenPGM will work with communities to maintain and/or improve access where feasible. Use of Camp 19 Road will not be restricted south of the mine site and access to the shoreline of the Pic River will be maintained.</p>
Traffic	<p>Request for information on:</p> <ul style="list-style-type: none"> <li>Number of trucks during construction and operation</li> <li>Continued access to the Pic River from Camp 19 Road</li> <li>Alternative entrances being considered</li> <li>Changes to Camp 19 Road and access road to site</li> </ul>	<p>An assessment of Project-related traffic, including changes to Camp 19 Road, was covered in the Traffic Impact Study (<a href="#">CIAR #227</a>) as part of the original EIS (2012). Updates on traffic volumes are provided in Section 1.5.2 and 1.5.4.4 of EIS Addendum (Vol 1) (<a href="#">CIAR #727</a>) and is further addressed in Section 6.2.9.6.2 of this of EIS Addendum (Vol 2).</p> <p>Continued access to the Pic River along Camp 19 Road will be accommodated, with restricted access via a security gate only proposed at the entrance to the mine site, west of Pic River.</p> <p>A description of access to the mine from Highway 17 along Camp 19 Road and the new mine site access road is provided in Section 1.5.4.11 of the of EIS Addendum (Vol 1).</p>
Wildlife	<p>Noted wildlife and plant species of interest to the community.</p>	<p>Consideration of wildlife and plant species of importance to Indigenous communities were included in the Terrestrial Environment Baseline Report Update (Northern Bioscience, 2020) (<a href="#">CIAR # 722</a>), including identification of presence/absence within the SSA.</p> <p>The VEC assessment for vegetation (Section 6.2.6), wildlife (Section 6.2.7) and Species at Risk (Section 6.2.8), in this of EIS Addendum (Vol 2), will consider the potential effects of the Project on these species. The Human Health Risk Assessment Update, included as Appendix D10 of this EIS Addendum (Vol 2), assesses impacts of the Project on traditional/country foods used by local land users and communities. Consideration of impacts on these species of importance to Indigenous communities will inform the determination of significance of Project-related effects.</p>

## 5.2.5.2 Pic Moberg First Nation

Based on the November 2020 Letter of Support provided by PMFN, all issues are currently considered resolved.

Key topics discussed with PMFN throughout Phase 1 of the Consultation for the Project are summarized in Table 5.2-10.

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**Table 5.2-10: Key Issues and Responses to PMFN**

Topic	PMFN Comments	Proponent Response
Closure/ remediation	Request for information on remediation of the site including: <ul style="list-style-type: none"> <li>• Monitoring program</li> <li>• Remediation of Pits into productive lakes</li> </ul>	Follow-up and monitoring programs are proposed as part of the Project and will be refined through detailed design, as committed to in Chapter 7 of the original EIS (2012) and in Chapter 7 of this EIS Addendum (Vol 2).  A conceptual description of the closure plan is provided in Section 1.5.2.3 of EIS Addendum (Vol 1) ( <a href="#">CIAR #727</a> ) and is illustrated on Figure 1.5-3 of that report. The closure plan will be completed in accordance with O. Reg. 240/00 and will focus on returning the site to a naturalized condition that supports use by Indigenous communities and the public, in a manner that is supported by the government, where feasible.  The PSMF and storm water pond will be reclaimed and restored into potential fish habitat. The South and Central Pits will be filled with mine rock and process solids upon mine closure, while the North Pit will be filled with water to function as possible fish habitat.
Consultation	Request for community consultation to ensure that TK and TLRU (confidential) is incorporated into the EIS Addendum and supporting technical studies.	Specific TLRU/TK information has been included within the EIS Addendum, however details on locations, community and other references that could disclose the source of TLRU/TK are excluded to ensure confidentiality. A comprehensive list of VECs was provided by PMFN in February 2012. This information has been used to inform the characterization of baseline conditions, the effects assessments, and the selection of VECs. Chapter 6 of this EIS Addendum (Vol 2) provides detail on the assessment of Project-related effects on each VEC.
EA / approvals process	Request for information on: <ul style="list-style-type: none"> <li>• EA process</li> </ul> Noted comment on request for training to better understand the EA process.	GenPGM has worked with IAAC to confirm that the Project is being assessed in accordance with CEAA, 2012. Additional details on the EA process can be found in Section 1.3 of EIS Addendum (Vol 1) ( <a href="#">CIAR #727</a> ).  The EA process is established by IAAC and details can be found on the Project registry.
EA Methodology	Request for information on how VECs were selected and how Project-related impacts will be assessed.	VEC's were provided in confidence by PMFN on February 3, 2012. VECs were selected based on a range of factors, including prior experience, community input, and direction from the EIS Guidelines. The selection process is covered in Section 2.3.3 of EIS Addendum (Vol 1) ( <a href="#">CIAR #727</a> ).  Section 6 of this EIS Addendum (Vol 2) provides additional information on the EA methods including the assessment of effects on each VEC in (see Section 6.2 of this EIS Addendum [Vol 2]).
Fish and Fish Habitat	Request for information on fish survey methodology.	Details on the fish survey methods and results were included in the Aquatic Environment Baseline Report Update (Ecometrix, 2020b) ( <a href="#">CIAR # 722</a> ), including a summary of previous methods employed, updated survey methods, and the identification of presence / absence within waters potentially affected by the Project.

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**Table 5.2-10: Key Issues and Responses to PMFN**

Topic	PMFN Comments	Proponent Response
Groundwater	Request for information on mitigation measures to protect groundwater.	Section 6.2.3 of this EIS Addendum (Vol 2) covers the assessment of effects to water quality and quantity, including a description of changes, mitigation measures, and follow-up and monitoring programs. Additional details on anticipated effects to groundwater are assessed in the Hydrogeology Updated Effects Assessment (Appendix D4 of this EIS Addendum [Vol 2]).
Labour, Education and Economy	Request for information on: <ul style="list-style-type: none"> <li>• Number of employment opportunities</li> <li>• Types of employment opportunities</li> <li>• Training opportunities</li> </ul>	A workforce of approximately 900 workers will be required during site preparation and construction and that approximately 375 workers will be required for mine operation (see Section 1.5.2 of EIS Addendum Vol 1).
Project Design	Request for information on: <ul style="list-style-type: none"> <li>• Areas to be impacted</li> <li>• The type of mining that will occur (e.g., open) and details on whether a PSMF will be required and what chemicals will be used</li> <li>• Project life</li> </ul>	The SSA, LSA and RSA, which represents the areas being assessed for impacts are covered in Section 2.4 of EIS Addendum (Vol 1) ( <a href="#">CIAR #727</a> ) and within the effects assessment for the various VECs in Chapter 6 of this EIS Addendum (Vol 2).  The mine design is covered in Section 1.5.4 of EIS Addendum (Vol 1), which includes an update on the type of materials to be mined by the Project, specifically palladium, copper and possible concentrates of iron sulfide, magnetite and vanadium. This includes an update on the expected mine life. A summary of this information has been communicated to PMFN through a series of project updates.
Surface Water	Request for information on mitigation measures to protect surface water.  Noted community interest in water quality protection for subwatersheds affected by the Project that discharge to the Pic River and a desire to limit or prohibit contaminated water (e.g., tailings water) from being able to enter the Pic River watershed.	Section 6.2.3 of this EIS Addendum (Vol 2) covers the assessment of effects to water quality and quantity, including a description of changes, mitigation measures and follow-up and monitoring programs. Additional details on anticipated effects to surface water are assessed in the Surface Water Hydrology Updated Effects Assessment (Appendix D3 of this EIS Addendum [Vol 2]).  As noted in Section 1.6 of EIS Addendum (Vol 1) ( <a href="#">CIAR #727</a> ), changes to the Project have been proposed to further reduce potential impacts on the Pic River watershed.
TLRU/TK	Identification of TLRU/TK (confidential) that may be affected by the Project and a request for information on how existing activities may be affected by the Project.	Specific TLRU/TK values have been included within the EIS Addendum but details that may disclose the identity of the community have been removed to ensure confidentiality of such information. This information has been used to inform the characterization of baseline conditions, the effects assessments, and the selection of VECs.  TLRU/TK has been considered in the assessment of potential effects as detailed in Chapter 6 of this EIS Addendum (Vol 2), specific to each VEC.
Wildlife	Request for information on mitigation measures to keep wildlife out of PSMF.	Section 6.2.7 of this EIS Addendum (Vol 2) includes a discussion of mitigation measures to protect wildlife from Project-related effects, including mitigation to protect wildlife from the PSMF.

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### 5.2.5.3 Pays Plat First Nation

Key issues raised by PPFN throughout consultation for this Project (including a 2020 submission to the Panel ([CIAR #723](#))) have been summarized in Table 5.2-11.

Notable concerns include potential impacts to Lake Trout and Brook Trout habitat, the effects on woodland caribou migration, and the cumulative impacts to the Lake Superior Area of Concern at Peninsula Harbour (Marathon) and Jackfish Bay (Terrace Bay). Other concerns with respect to EA methods, Project Design, TK and consultation with PPFN were also raised. These concerns are addressed in the EIS Addendum process and through ongoing Committee meetings and collaboration with PPFN's third-party technical reviewer.

An issues tracking table has also been developed to inform ongoing Committee meetings and ensure follow up occurs as needed.

**Table 5.2-11: Key Issues and Responses to PPFN**

Topic	PPFN Comment	Proponent Response
Baseline Studies	Request for updated information on baseline conditions	Updated baseline condition reports have been prepared and submitted to IAAC in support of the EIS Addendum ( <a href="#">CIAR #722</a> ). These updates identify changes to the baseline conditions based on new primary and secondary source data available to the Project Team.
Closure/ remediation	Request for information on the remediation of the site including: <ul style="list-style-type: none"> <li>Remediation of Pits into productive lakes</li> <li>Opportunities for site access</li> </ul>	A conceptual description of the closure plan is provided in Section 1.5.2.3 of EIS Addendum (Vol 1) ( <a href="#">CIAR #727</a> ) and is illustrated on Figure 1.5-3 of that report.  The PSMF and storm water pond will be reclaimed and restored to potential fish habitat. The South and Central Pits will be filled with mine rock and process solids upon mine closure, while the North Pit will be filled with water to function as potential fish habitat.  Access to the mine site during operation will be limited for safety reasons; however, GenPGM will work with communities to maintain and/or improve access where feasible. Use of Camp 19 Road will not be restricted south of the mine site and access to the shoreline of the Pic River will be maintained.
Consultation	Request for further consultation to: <ul style="list-style-type: none"> <li>Incorporate TK and TLRU (confidential) into the EIS Addendum and supporting technical studies.</li> </ul>	A comprehensive list of VECs was confirmed with PPFN on January 13, 2012, and it was requested to keep the VECs generic in the EIS Report and Addendum.  A TLRU/TK study was provided in September 2013. This information has been used to inform the characterization of baseline conditions, the effects assessments, and the selection of VECs. Chapter 6 of this EIS Addendum (Vol 2) provides detail on the assessment of Project-related effects on each VEC.
Cumulative Effects	Consideration of the Project's contribution to cumulative effects on the Lake Superior Area of Concern and Jackfish Bay Area of Concern.	An updated cumulative effects assessment was undertaken as detailed in Section 6.6 of this EIS Addendum (Vol 2). The cumulative effects assessment includes an assessment of VECs for which a residual adverse environmental effect from the Project is predicted, regardless of significance.  Potential cumulative effects to fish and fish habitat at the Jackfish Bay Area of Concern are included in the assessment and are not considered significant.

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**Table 5.2-11: Key Issues and Responses to PPFN**

Topic	PPFN Comment	Proponent Response
EA Methodology	Request for information on how project interactions and how a determination of significance was made	Further details regarding the method used in the original EIS (2012) for determining significance was provided in response to AIR#3 ( <a href="#">CIAR #648</a> ). Additional information on the EA methods is provided in Section 6.1 of this EIS Addendum (Vol 2) and is further discussed in the assessment of impacts on each VEC in Section 6.2.
Fish and Fish Habitat	Noted potential effect on steelhead population in Stream 6/ Angler Creek (Subwatershed 106). Noted fish species of interest to the community, including lake trout and brook trout.	As noted in Section 1.6 of EIS Addendum (Vol 1) ( <a href="#">CIAR #727</a> ), changes to the Project have been proposed to further reduce potential impacts on the Pic River watershed. Consideration of impacts on fish species of importance to Indigenous communities informed the determination of significance of Project-related effects. The VEC assessment for fish and fish habitat is covered in Section 6.2.4 of this EIS Addendum (Vol 2), which considers the potential effects of the Project on these species. The consumption of fish is considered in the Human Health Risk Assessment that is included in Section 6.2.10 of this EIS Addendum (Vol 2).
Groundwater	Request for information on mitigation measures to protect groundwater, specifically water quality in groundwater that will flow from the MRSA and PSMF and impacts of dewatering.	Section 6.2.3 of this EIS Addendum (Vol 2) covers the assessment of effects to water quality and quantity, including a description of changes, mitigation measures, and follow-up and monitoring programs. A detailed assessment of the effects to groundwater had been assessed in the Hydrogeology Updated Effects Assessment (Appendix D4 of this EIS Addendum [Vol 2]).
Labour, Education and Economy	Request for information on: <ul style="list-style-type: none"> <li>• Number of employment opportunities</li> <li>• Types of employment opportunities, including whether there will be full time or contract positions</li> <li>• Training and education required for employment</li> <li>• Training opportunities</li> </ul>	A workforce of approximately 900 will be required during site preparation and construction and 375 workers will be required for mine operation (see Section 1.5.2 of EIS Addendum [Vol 1]) ( <a href="#">CIAR #727</a> ). GenPGM has committed to sharing information regarding employment opportunities associated with the Project to PPFN through ongoing meetings with PEDC. The Company has committed to on-going investment in training, employment, and other economic benefits to the community.
Project Design	Request for information on: <ul style="list-style-type: none"> <li>• Rail load-out facility</li> <li>• Smelting facility location</li> <li>• Concentrates</li> </ul>	Concentrates from the Project will be transported to an existing 3 <sup>rd</sup> party smelting facility for processing. Rail load-out facility details and smelting facility location have not been finalized at this time.  GenPGM has optimized the design of the Project in response to the results of additional exploratory drilling and an updated Feasibility Study ( <a href="#">CIAR #741</a> ). An optimized Project Description is provided in Section 1.5.4 of EIS Addendum (Vol 1) ( <a href="#">CIAR #727</a> ). Where detailed design is not complete, a conservative approach has been taken in assessing potential environmental impacts of the Project.

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**Table 5.2-11: Key Issues and Responses to PPFN**

Topic	PPFN Comment	Proponent Response
Surface Water	<p>Request for information on mitigation measures to protect surface water.</p> <p>Noted importance of Hare Creek (Subwatershed 105), Stream 6/Angler Creek (Subwatershed 106), Lake Superior and Pic River.</p>	<p>Section 6.2.3 of this EIS Addendum (Vol 2) covers the assessment of effects to water quality and quantity, including a description of changes, mitigation measures and follow-up and monitoring programs. Additional details on anticipated effects to surface water are assessed in the Surface Water Hydrology Updated Effects Assessment (Appendix D3 of this EIS Addendum [Vol 2]).</p> <p>As noted in Section 1.6 of EIS Addendum (Vol 1) <a href="#">(CIAR #727)</a>, changes to the Project have been proposed to further reduce potential impacts on the Pic River watershed. This includes reducing potential for contact waters to enter the Pic River, moving infrastructure out of watersheds that drain to the Pic River, and operating a water treatment plant prior to release at single point of discharge in Hare Lake.</p> <p>As identified through consultation during the original EIS (2012), direct discharge to Lake Superior and Angler Creek were not supported by communities. Hare Lake was selected as the preferred alternative for discharge. Communities also requested that the Project footprint be reduced to lower the number of subwatersheds impacted, and to protect fisheries and water quality in the region.</p> <p>GenPGM was recently informed of a potential sampling program carried on by Pukaskwa National Park at Hare Creek. Although surface water quality over all seasons and at various segments along Hare Creek have been sampled annually since 2008, GenPGM will follow up with Pukaskwa Park to determine if data is available to share with PPFN.</p>
TLRU/TK	<p>Identification of TLRU/TK (confidential) that may be affected by the Project, including traditional activities identified along Hare Creek.</p> <p>Request for more details on access restrictions and controls.</p>	<p>Specific TLRU/TK values have been included within the EIS Addendum but details that may disclose the identity of the community have been removed to ensure confidentiality of such information. This information has been used to inform the characterization of baseline conditions, the effects assessments, and the selection of VECs. Consideration of how TLRU/TK has been contemplated in the assessment of potential effects is detailed in Chapter 6 this EIS Addendum (Vol 2).</p> <p>Section 1.6 of the EIS Addendum (Vol 1) <a href="#">(CIAR #727)</a> provides a description of the proposed changes to Camp 19 Road and the new mine site access road.</p> <p>Use of Camp 19 Road will not be restricted south of the mine site and access to the shoreline of the Pic River will be maintained.</p>
Vegetation	<p>EIS did not recognize the occurrence of plant species with cultural significance</p>	<p>The original EIS (2012) included consideration of the list of plant species provided by PPFN. Consideration of plant species of importance to Indigenous communities were also included in the Terrestrial Environment Baseline Report Update (Northern Bioscience, 2020) <a href="#">(CIAR # 722)</a>, including identification of presence / absence within the SSA.</p>
Wildlife	<p>Noted wildlife species of interest to the community.</p> <p>Request for Project-specific data pertaining to Species at Risk and furbearers</p>	<p>Consideration of wildlife species of importance to Indigenous communities, as well as updated information on expected SAR and furbearers in the area, were included in the Terrestrial Environment Baseline Report Update (Northern Bioscience, 2020), including identification of presence / absence within the SSA.</p> <p>The VEC assessments for vegetation (Section 6.2.6), wildlife (Section 6.2.7) and Species at Risk (Section 6.2.8), of this EIS</p>

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**Table 5.2-11: Key Issues and Responses to PPFN**

Topic	PPFN Comment	Proponent Response
		Addendum (Vol 2), consider the potential effects of the Project on these species. Consideration of impacts on these species of importance to Indigenous communities informed the determination of significance of Project-related effects.

## 5.2.5.4 Red Sky Métis Independent Nation

Key issues raised by RSMIN throughout consultation for this Project have been summarized in Table 5.2-12. These issues are a summary of information provided in the original EIS (2012) and new issues will be addressed as the ongoing consultation with RSMIN progresses.

**Table 5.2-12: RSMIN Key Comments and Responses**

Topic	RSMIN Comment	Proponent Response
Closure/ remediation	Request for information on the remediation of the site including: <ul style="list-style-type: none"> <li>Remediation of Pits into productive lakes</li> <li>Opportunities for site access</li> </ul>	A conceptual description of the closure plan is provided in Section 1.5.2.3 of EIS Addendum (Vol 1) ( <a href="#">CIAR #727</a> ) and is illustrated on Figures 1.5-3, 1.5.4 and 1.5.5 of that report. The closure plan will be completed in accordance with O. Reg. 240/00 and will focus on returning the site to a naturalized condition that supports use by Indigenous communities in a manner that is supported by safety regulations.  The pits will be allowed to flood during the post-closure period and could potentially provide fish habitat in the long term.  The stormwater management pond and the PSMF water management pond will be reclaimed to potential fish habitat.  Access to the mine site during operation will be limited for safety reasons; however, GenPGM will work with communities to maintain and/or improve access where feasible. Use of Camp 19 Road will not be restricted south of the mine site and access to the shoreline of the Pic River will be maintained.
Consultation	Request for community consultation to ensure that TK and TLRU (confidential) is incorporated into the EIS Addendum and supporting technical studies.  Request for environmental monitoring results to be made available	A comprehensive list of VECs was provided by RSMIN in November 2011. This information has been used to inform the characterization of baseline conditions, the effects assessments, and the selection of VECs. Chapter 6 of this EIS Addendum (Vol 2) provides detail on the assessment of Project-related effects, specific to each VEC.
Groundwater	Request for information on mitigation measures to protect groundwater.	Section 6.2.3 of this EIS Addendum (Vol 2) covers the assessment of effects to water quality and quantity, including a description of changes, mitigation measures, and follow-up and monitoring programs. Additional details on anticipated effects to groundwater are assessed in the Hydrogeology Updated Effects Assessment (Appendix D4 of this EIS Addendum [Vol 2]).
Socio-economic	Expressed concern about mental, social, and spiritual well-being of individuals and	Socio-economics are anticipated to be impacted in a positive way as a result of the Project. Ongoing work with local communities

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**Table 5.2-12: RSMIN Key Comments and Responses**

Topic	RSMIN Comment	Proponent Response
	families due to increased job opportunities and changing demographics.	and Project stakeholders will allow for adaptive management as needed. Mental health and addictions services, which are included in the community service VEC, have been identified as potential areas of concern due to operational capacity. The establishment by GenPGM of health services on the Project site including an employee assistance program should help mitigate Project effects on mental, social, and spiritual well-being of individuals and communities.
Labour, Education and Economy	Request for information on: <ul style="list-style-type: none"> <li>• Number of employment opportunities</li> <li>• Types of employment opportunities, including whether there will be full time or contract positions</li> <li>• Training and education required for employment</li> <li>• Training opportunities</li> </ul> Noted, opportunities for community businesses, including those related to procurement and supply, to provide services throughout the life of the mine.	A workforce of approximately 900 workers will be required during site preparation and construction and that approximately 375 workers will be required for mine operation (see Section 1.5.2 of EIS Addendum Vol 1) ( <a href="#">CIAR #727</a> ). GenPGM also provides the RSMIN economic development corporation and Métis Free Trader regular Project updates and is committed to ongoing collaboration to maximize community benefits.
Project Alternatives	Request for information on the alternatives assessment process.  Noted comment on lack of a review of alternatives for the PSMF.	Chapter 3 of EIS Addendum (Vol 1) ( <a href="#">CIAR #727</a> ) provides an update on the assessment of alternatives to the Project, including alternatives to the management of process solids.
Surface Water	Request for information on mitigation measures to protect surface water, specifically as it relates to process solids discharge and PAG rock storage.	As noted in Section 1.6 of EIS Addendum (Vol 1) ( <a href="#">CIAR #727</a> ), changes to the Project have been proposed to further reduce potential impacts on the Pic River watershed. Section 6.2.3 of this EIS Addendum (Vol 2) covers the assessment of effects to water quality and quantity, including a description of changes, mitigation measures and follow-up, and monitoring programs relating to water balance, surface water quality, and hydrology. Community information sessions about mitigation measures and water management were held in January and March 2021 to further inform the communities and discuss these concerns.
TLRU/TK	Identification of TLRU/TK (confidential) that may be affected by the Project, including the use of local plants.	RSMIN completed a TLRU study in 2012. Consideration of TLRU/TK has been included in the assessment of potential effects as detailed in Chapter 6 of this EIS Addendum (Vol 2), specific to each VEC.



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**Table 5.2-12: RSMIN Key Comments and Responses**

Topic	RSMIN Comment	Proponent Response
Species at Risk	Noted potential effects to species at risk. Stated particular interest in bumble bees	The VEC assessment for vegetation (Section 6.2.6), wildlife (Section 6.2.7) and Species at Risk (Section 6.2.8), included in this EIS Addendum (Vol 2) considers the potential effects of the Project on these species. Further discussion on RSMIN's bumble bee study and opportunities for collaboration will be explored.

## 5.2.5.5 Jackfish Métis (OCIP)

Key issues raised by OCIP throughout consultation for this Project have been summarized in Table 5.2-13. These issues are a summary of information provided in the original EIS (2012) and new issues will be addressed as the ongoing consultation with OCIP progresses.

**Table 5.2-13: Key Issues and Responses to OCIP**

Topic	OCIP Comment	Proponent Response
Acoustic Environment	Request for information on the potential effects of blasting to the Pic River and aquatic species	Section 6.2.2 of this EIS Addendum (Vol 2) covers the assessment of effects to acoustics, including blasting, and will cover a description of changes, mitigation measures, and monitoring programs. Additional details on anticipated noise effects will be assessed in the Noise Updated Effects Assessment Report (Appendix D2 of this EIS Addendum [Vol 2]).
Atmospheric Environment	Request for information on potential effect from Project-related dust and impacts to air traffic and airport.	Section 6.2.1 of this EIS Addendum (Vol 2) covers the assessment of effects to air quality, including dust, and a description of changes, mitigation measures, and monitoring programs. Additional details on anticipated effects to air quality will be assessed in the Air Quality Updated Effects Assessment Report (Appendix D1 of this EIS Addendum [Vol 2]).
Closure/ remediation	Request for information on the remediation of the site including: <ul style="list-style-type: none"> <li>The aesthetics upon completion</li> <li>Opportunities for site access, including road access</li> <li>The identification of any long-term environmental impacts</li> </ul>	A conceptual description of the closure plan is provided in Section 1.5.2.3 of EIS Addendum (Vol 1) ( <a href="#">CIAR #727</a> ) and is illustrated on Figures 1.5-3, 1.5.4 and 1.5.5 of that report. The closure plan will be completed in accordance with O. Reg. 240/00 and will focus on returning the site to a naturalized condition that supports use by Indigenous communities in a manner that is supported by safety regulations. Access to the mine site during operation will be limited for safety reasons; however, GenPGM will work with communities to maintain and/or improve access where feasible.  Monitoring during closure will include verifying the success of reclamation and confirming on-site water quality has stabilized and there are no long-term geochemistry concerns. Pit water quality will be monitored prior to pit overflow.
Consultation	Request for community consultation to ensure that TK and TLRU (confidential) is incorporated into the EIS	A comprehensive list of VECs was provided by OCIP in November 2011 and TLRU/TK studies in September 2012. This information has been used to inform the characterization of baseline conditions and the effects assessments, and the

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**Table 5.2-13: Key Issues and Responses to OCIP**

Topic	OCIP Comment	Proponent Response
	Addendum and supporting technical studies.	selection of VECs. Chapter 6 of this EIS Addendum (Vol 2) provides details on the assessment of Project-related effects on each VEC.
Groundwater	Request for information on mitigation measures to protect groundwater	Section 6.2.3 of this EIS Addendum (Vol 2) covers the assessment of effects to water quality and quantity, including a description of changes, mitigation measures, and follow-up and monitoring programs. Additional details on anticipated effects to groundwater will be assessed in the Environmental Hydrogeology Updated Effects Assessment (Appendix D4 of this EIS Addendum [Vol 2]).
Labour, Education and Economy	Request for information on: <ul style="list-style-type: none"> <li>• Number of employment opportunities</li> <li>• Types of employment opportunities, including whether there will be full time or contract positions</li> <li>• Training and education required for employment</li> <li>• Training and education opportunities, including bursaries for post-secondary education</li> <li>• Contracting opportunities (e.g., tree removal, earth works, etc.)</li> </ul>	A workforce of approximately 900 workers will be required during site preparation and construction and that approximately 375 workers will be required for mine operation (see Section 1.5.2 of EIS Addendum Vol 1) ( <a href="#">CIAR #727</a> ). An analysis of Project-related socio-economic effects is included in Section 6.2.9 of this EIS Addendum (Vol 2).
Project Design	Request for information on the design of the PSMF dam, including a comment to minimize visual impact.	An updated description of the Project to reflect refinements to the mine design, including the PSMF, is described in Section 1.5.4 of EIS Addendum (Vol 1) ( <a href="#">CIAR #727</a> ). Consideration of the visual impacts of the PSMF will be addressed in the analysis of Project-related socio-economic effects in Section 6.2.9 of this EIS Addendum (Vol 2).
Surface Water	Request for information on mitigation measures to protect surface water. Noted community interest in water quality protection for subwatersheds affected by the Project that discharge to the Pic River and a desire to limit or prohibit contaminated water (e.g., tailings water) from being able to enter the Pic River watershed.	Section 6.2.3 of this EIS Addendum (Vol 2) covers the assessment of effects to water quality and quantity, including a description of changes, mitigation measures, and follow-up and monitoring programs relating to water balance, surface water quality, and hydrology. As noted in Section 1.6 of EIS Addendum (Vol 1) ( <a href="#">CIAR #727</a> ), changes to the Project have been proposed to further reduce potential impacts on the Pic River watershed.
TLRU/TK	Identification of TLRU/TK (confidential) that may be affected by the Project. Request for more details on access restrictions and controls.	Specific TLRU/TK values have been included within the EIS Addendum but details that may disclose the identity of the community have been removed to ensure confidentiality of such information. This information has been used to inform the characterization of baseline conditions, the effects assessments, and the selection of VECs. Consideration of how TLRU/TK has been considered in the assessment of potential

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**Table 5.2-13: Key Issues and Responses to OCIP**

Topic	OCIP Comment	Proponent Response
		<p>effects is covered in Chapter 6 of this EIS Addendum (Vol 2), specific to each VEC.</p> <p>Section 1.5.4.11 and 1.6 of the EIS Addendum (Vol 1) (<a href="#">CIAR #727</a>) provides a description of the proposed changes to Camp 19 Road and the new mine site access road.</p> <p>Use of Camp 19 Road will not be restricted south of the mine site and access to the shoreline of the Pic River will be maintained.</p>
Traffic	Requested information on potential effects from Project related traffic and needed mitigation measures.	<p>An assessment of Project-related traffic, including changes to Camp 19 Road, was covered in the Traffic Impact Study (<a href="#">CIAR #227</a>) as part of the original EIS (2012). Updates on traffic volumes are provided in Section 1.5.2 and 1.5.4.4 of EIS Addendum (Vol 1) (<a href="#">CIAR #727</a>) and are further discussed in in Section 6.2.9.6.2 of this EIS Addendum (Vol 2).</p>

### 5.2.5.6 Superior North Shore Métis

Key issues raised by MNO throughout consultation for this Project have been summarized in Table 5.2-14. These issues are a summary of information provided in the original EIS (2012) and new issues will be addressed as the ongoing consultation with MNO progresses.

**Table 5.2-14: Key Issues and Responses to MNO**

Topic	MNO Comment	Proponent Response
Closure/ remediation	<p>Request for information on the remediation of the site including:</p> <ul style="list-style-type: none"> <li>Remediation of Pits into productive lakes</li> <li>Opportunities for site access</li> </ul>	<p>A conceptual description of the closure plan is provided in Section 1.5.2.3 of EIS Addendum (Vol 1) (<a href="#">CIAR #727</a>) and is illustrated on Figures 1.5-3, 1.5.4 and 1.5.5 of that report. The closure plan will be completed in accordance with O. Reg. 240/00 and will focus on returning the site to a naturalized condition that supports use by Indigenous communities in a manner that is supported by safety regulations.</p> <p>The pits will be allowed to flood during the post-closure period and could potentially provide fish habitat in the long term.</p> <p>The stormwater management pond and the PSMF water management pond will be reclaimed to potential fish habitat.</p> <p>Access to the mine site during operation will be limited for safety reasons; however, GenPGM will work with communities to maintain and/or improve access where feasible.</p>
Consultation	<p>Request for community consultation to ensure that TK and TLRU (confidential) is incorporated into the EIS Addendum and supporting technical studies.</p> <p>Request for inclusion of community during environmental monitoring.</p>	<p>A Letter of Intent outlining the MNO consultation process is currently being negotiated. The Agreement will include provisions for technical review, community consultation and cultural projects.</p> <p>Environmental monitoring is ongoing, and MNO is kept informed of planned field programs. Long term community participation in environmental monitoring at site and locally is anticipated.</p>

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**Table 5.2-14: Key Issues and Responses to MNO**

Topic	MNO Comment	Proponent Response
Fish and Fish Habitat	Noted fish species of interest to the community.	<p>Consideration of fish species of importance to Indigenous communities was included in the Aquatic Environment Baseline Report Update (Ecometrix 2020b) (<a href="#">CIAR # 722</a>), including identification of presence / absence within waters potentially affected by the Project.</p> <p>The VEC assessment for fish and fish habitat provided in Section 6.2.4 of this EIS Addendum (Vol 2) considers the potential effects of the Project on identified species. The consumption of fish will be considered in the Human Health Risk Assessment Update, which is included as Appendix D10 of this EIS Addendum (Vol 2). Consideration of impacts on fish species of importance to Indigenous communities will inform the determination of significance of Project-related effects.</p>
Groundwater	Request for information on measures to protect groundwater.	Section 6.2.3 of this EIS Addendum (Vol 2) covers the assessment of effects to water quality and quantity, including a description of changes, mitigation measures, and follow-up, and monitoring programs. Additional details on anticipated effects to groundwater will be assessed in the Environmental Hydrogeology Updated Effects Assessment (Appendix D4 of this EIS Addendum [Vol 2]).
Labour, Education and Economy	Request for information on: <ul style="list-style-type: none"> <li>• Number of employment opportunities</li> <li>• Types of employment opportunities, including whether there will be full time or contract positions</li> <li>• Training and education required for employment</li> <li>• Training opportunities</li> </ul>	<p>A workforce of approximately 900 will be required during construction and 375 workers will be required for mine operation (see Section 1.5.2 of EIS Addendum (Vol 1) (<a href="#">CIAR #727</a>).</p> <p>A Letter of Intent outlining consideration of education and training opportunities for the MNO is currently being negotiated. The Agreement will also consider contracting opportunities.</p>
Surface Water	Request for information on mitigation measures to protect surface water.	<p>Section 6.2.3 of this EIS Addendum (Vol 2) covers the assessment of effects to water quality and quantity, including a description of changes, mitigation measures and follow-up, and monitoring programs relating to water balance, surface water quality, and hydrology.</p> <p>A Water Management meeting was held in March 2021 to allow for further understanding and discussion around water.</p>
TLRU/TK	Identification of TLRU/TK (confidential) that may be affected by the Project.  Noted that TLRU studies require update	<p>Specific TLRU/TK information received January 2012 and December 2013 has been considered in the EIS Addendum. MNO has noted the need to update these studies in 2021.</p> <p>TLRU/TK was incorporated into the EIS Addendum for each biological and social VEC and also incorporated in the Indigenous considerations (Section 6.2.12 of this EIS Addendum [Vol 2]).</p>
Wildlife	Noted wildlife and plant species of interest to the community.	Consideration of wildlife and plant species of importance to Indigenous communities were included in the Terrestrial Environment Baseline Report Update (Northern Bioscience, 2020) ( <a href="#">CIAR # 722</a> ), including identification of presence / absence within the SSA.

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### 5.2.5.7 Michipicoten First Nation

**Table 5.2-15: Key Issues and Responses to Michipicoten First Nation**

Topic	Michipicoten Comment	Proponent Response
Project Ownership	Request information on Project ownership, capital expenditures, resource grade and total ounces	Generation Mining owns an 80% interest in a JV partnership with Sibanye-Stillwater who owns 20% of the Project. A Preliminary Economic Assessment is available on the Generation Mining website, and a Feasibility Study was published in April 2021 ( <a href="#">CIAR #741</a> ).
Consultation	Request for capacity funding	IAAC provided funding in March 2021 for the community's direct participation in the Joint Review Panel Process.
Surface Water	Noted importance of Lake Superior and regional eutrophication due to phosphorous discharge	Section 6.2.3 of this EIS Addendum (Vol 2) covers the assessment of effects to water quality and quantity, including a description of changes, mitigation measures and follow-up, and monitoring programs relating to water balance, surface water quality, and hydrology. Section 1.5.4.8 of EIS Addendum (Vol 1) ( <a href="#">CIAR #727</a> ) describes the management techniques that will be used to manage water on site.  Water quality monitoring is an integral part of the environmental management program for the Project. The water quality and quantity monitoring program is covered in Section 7.1 and 3 of this EIS Addendum (Vol 2).
Species at Risk	Noted importance of woodland caribou	The VEC assessment for vegetation (Section 6.2.6), wildlife (Section 6.2.7) and Species at Risk (Section 6.2.8), included in this EIS Addendum (Vol 2) considers the potential effects of the Project on woodland caribou. Specifically, an overall benefit plan (OBP) will be implemented to provide for the creation and improvement of regional and local caribou habitat to compensate for habitat loss as a result of the Project.

### 5.2.5.8 Ginoogaming First Nation

As noted, GenPGM has reached out to Ginoogaming First Nation, who has replied stating their intention to provide comments to the Joint Review Panel. No further correspondence has taken place.

## 5.3 PUBLIC CONSULTATION

The following sections broadly describe the principles and approach to consultation with the public undertaken by GenPGM since the restart of the Project in June 2020 to inform this EIS Addendum. The approach is consistent with the principles and objectives outlined in the original EIS (2012). This section outlines the approach to consultation, the public consultation activities undertaken by GenPGM since June 2020, the key issues raised during consultation, and describes plans for ongoing consultation activities. A summary of the public consultation activities and results from the original EIS (2012) is available in Section 4.6 and Appendix 3 of the original EIS (2012).

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### 5.3.1 Approach and Overview

GenPGM's consultation strategy since the restart of the Project focuses on informing the public about changes to Project components, Project design, and updates on the Panel Review process, while providing opportunities to collaboratively discuss baseline data, identify environmental and social issues, and to identify and discuss the Project VECs used to assess potential effects. GenPGM believes consultation is integral to ensuring a transparent process that builds trusts and understanding of the Project, and to understand potential effects as a result of the Project. The public consultation strategy was developed in accordance with the following principles:

- Engaging interested members of the public early in the process and working to ensure they have a clear understanding of the Project
- Notifying the public about engagement opportunities early and often throughout the EA process
- Welcoming input from the public and other stakeholder organizations and incorporating it into the updated technical studies and EIS Addendum, where feasible

### 5.3.2 Identified Stakeholders and Organizations

The Marathon Economic Development Corporation and Chamber of Commerce participated in the public information sessions held within the Town of Marathon. Both organizations are being provided with email updates on the Project, including notices of future public consultation activities and opportunities to comment on the EIS Addendum documents.

### 5.3.3 Public Consultation Activities

Since June 2020, GenPGM undertook a series of consultation and engagement activities with the public to inform the EIS Addendum. Activities have included several informal communication platforms (e.g., information boards, news briefs, and a website); public information sessions (in-person and virtual); and offers to present to various municipal councils. Active consultation to engage with the public began when the Project formally resumed in July of 2020. The method of consultation has been modified to accommodate public health concerns associated with COVID-19. The Town of Marathon has experienced numerous outbreaks of COVID-19, resulting in more frequent lockdowns and restrictions in the community preventing traditional face to face consultation. As a result, GenPGM has had to rely on virtual platforms and social media to share information on the Project. A summary of consultation activities completed since June of 2019 with the public and other stakeholder organizations having expressed interest in the Project is provided in Table 5.3-1. Further details and copies of relevant correspondence with the public and stakeholder organizations are provided in the updated ROC (Appendix C of this EIS Addendum [Vol 2]).

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**Table 5.3-1: Key Public Consultation Activities**

Activity	Date and Times	Description
Marathon Community Information Board	Available starting August 19, 2020	<p>A drive-up information board, including a comment box, was set up outside of the GenPGM Marathon Office. The following information was displayed:</p> <ul style="list-style-type: none"> <li>• Overview of the Project location and design</li> <li>• Overview of the EA process</li> <li>• Comparison of the 2012 and 2020 designs</li> <li>• Socio-economic community benefits</li> <li>• Project schedule, including estimated approvals and construction timeline</li> <li>• Overview of VECs and how they were selected</li> <li>• Posting of the community news briefs</li> </ul>
Project Website	Available prior to 2019	<p><a href="https://genmining.com/projects/generation-pgm/">https://genmining.com/projects/generation-pgm/</a> Website provides the following information:</p> <ul style="list-style-type: none"> <li>• Project overview</li> <li>• Report sharing</li> <li>• News briefs</li> <li>• Contact information to provide comments/ questions</li> </ul>
Social Media	Available starting August 2020	<p>YouTube: <a href="https://www.youtube.com/channel/UC_LfhaQwccpMV_aKipmec3Q">https://www.youtube.com/channel/UC_LfhaQwccpMV_aKipmec3Q</a> Facebook: <a href="https://www.facebook.com/search/top?q=Generation%20Mining">https://www.facebook.com/search/top?q=Generation%20Mining</a> LinkedIn: <a href="https://ca.linkedin.com/company/generation-mining">https://ca.linkedin.com/company/generation-mining</a></p> <p>All the social media sites provide numerous videos (33) with site tours, interviews, and Q&amp;A sessions, as well as articles, press releases and technical information related to Project updates.</p>
In-person drop-in Public Information Sessions at GenPGM Offices in Marathon	<p>August 10, 2020 2p.m. – 7p.m.</p> <p>August 11, 2020 2p.m. – 7p.m.</p> <p>August 12, 2020 2p.m. – 7p.m..</p> <p>September 22, 2020 9a.m. – 12p.m.</p> <p>September 23, 2020 9a.m. – 12p.m.</p>	<ul style="list-style-type: none"> <li>• Sessions advertised on local radio and in the Marathon Mercury. The Town of Marathon, as well as the Indigenous communities identified in Section 0 of this report, were all provided digital copies of the advertisements and display boards one week prior to the events.</li> <li>• Display boards providing information on the Project design changes, EA process, Project timelines, GenPGM, and an overview of the Project and its location.</li> <li>• Rock samples, a catalytic converter and copper materials were displayed</li> <li>• The September sessions included a display board on Valued Ecosystem Components (VECs) and their use within the EA process.</li> <li>• Comment cards and GenPGM contact information was made available to all attendees</li> <li>• Discussions focused on VECs and participant uses of the Project area for personal/recreational/hunting and other uses</li> </ul>
Virtual Public Information Session for Town of Marathon	November 3, 2020	<ul style="list-style-type: none"> <li>• Session advertised to local residents of Marathon as a pilot for future consultation.</li> <li>• GenPGM presented the following information:</li> <li>• Introduction to GenPGM</li> <li>• Need for the Project</li> </ul>

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**Table 5.3-1: Key Public Consultation Activities**

Activity	Date and Times	Description
		<ul style="list-style-type: none"> <li>• Project overview</li> <li>• Changes to Project design between 2012 and 2020</li> <li>• Project status and the EA process, including schedules and VECs</li> <li>• Community benefits as a result of the Project</li> </ul>
Manitouwadge Town Council Presentation	November 11, 2020	<p>GenPGM was a delegation at a virtual Town Council meeting where the following information was presented:</p> <ul style="list-style-type: none"> <li>• Introduction to GenPGM</li> <li>• Need for the Project</li> <li>• Project overview</li> <li>• Changes to Project design between 2012 and 2020</li> <li>• Project status and the EA process, including schedules and VECs</li> <li>• Community benefits as a result of the Project</li> </ul>
Community News Briefs	October 2020 to March 2021 (ongoing)	Weekly plain language information updates published in Thunder Bay Chronicle, Marathon Mercury, Wawatay Times (monthly) and Métis Voyageur (quarterly). The focus of these publications is to keep community members informed about the EA process and to solicit comments and questions. Each publication includes links to reports and provides an email address to contact GenPGM directly.

## 5.3.4 Key Issues

Key issues raised throughout recent public consultation for this Project have been summarized in Table 5.3-2.

**Table 5.3-2: Key Public Issues and Responses**

Topic	Comment	Response
Acoustic Environment	Request for information on the potential impact of blasting on the Pic River	Section 6.2.2 of this EIS Addendum (Vol 2) covers the assessment of effects to acoustics, including blasting, and will cover a description of changes, mitigation measures and monitoring programs. Additional details on anticipated effects to noise are assessed in the Noise Updated Effects Assessment Report (Appendix D2 of this EIS Addendum [Vol 2]).
Atmospheric Environment	Noted comment on concern about climate change	Section 6.2.1 of this EIS Addendum (Vol 2) covers the assessment of effects to the atmospheric environment, including climate change, and will cover a description of changes, mitigation measures and monitoring programs. Additional details on anticipated effects to the atmospheric environment are assessed in the Air Quality Updated



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**Table 5.3-2: Key Public Issues and Responses**

Topic	Comment	Response
		Effects Assessment Report (Appendix D1 of this EIS Addendum [Vol 2]).
Closure/ remediation	Request for information on the remediation of the site including: <ul style="list-style-type: none"> <li>• potential long-term risks</li> <li>• monitoring program</li> </ul>	A conceptual description of the closure plan is provided in Section 1.5.2.3 of EIS Addendum (Vol 1) <a href="#">(CIAR #727)</a> . Follow-up and monitoring programs are proposed as part of the Project and will be refined through detailed design, as committed to in Chapter 7 of the original EIS (2012), which has been updated in Section 7.3 of this EIS Addendum (Vol 2).
Cumulative effects	Request for information on cumulative affects assessment	An updated cumulative effects assessment of VECs for which a residual adverse environmental effect from the Project is predicted is provided in Section 6.6 of this EIS Addendum (Vol 2).
EA / approvals process	Request for information on: <ul style="list-style-type: none"> <li>• The EA process</li> <li>• Project timelines</li> </ul>	GenPGM has worked with IAAC to confirm that the Project is being assessed in accordance with CEAA, 2012. Additional details on the EA process can be found in Section 1.3 of the EIS Addendum (Vol 1) <a href="#">(CIAR #727)</a> . The EA process is established by CEAA, 2012 and details can be found on the Project registry website.
Fish and Fish Habitat	Noted concern about loss of fish bearing lakes and habitat	Section 6.2.4 of this EIS Addendum (Vol 2) covers the assessment of effects to fish and fish habitat, including a description of changes, mitigation measures and follow-up and monitoring programs. Additional details on the approach to the habitat offsetting strategy is provided in Appendix D6 of this EIS Addendum (Vol 2).
Labour, Education and Economy	Request for information on: <ul style="list-style-type: none"> <li>• Number of employment opportunities</li> <li>• Types of employment opportunities, including whether there will be full time or contract positions</li> <li>• Training and education required for employment</li> <li>• Training opportunities</li> <li>• Opportunities for youth and education materials about future careers</li> </ul>	A workforce of approximately 900 s will be required during construction and 375 workers will be required for mine operation (see Section 1.5.2 of EIS Addendum (Vol 1) <a href="#">(CIAR #727)</a> . GenPGM will work with local municipalities to establish measures that will encourage and recruit employees from the existing populations in local communities. Opportunities for training of local population and youth will be provided.

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**Table 5.3-2: Key Public Issues and Responses**

Topic	Comment	Response
	Noted request for opportunities for community businesses, including those related to procurement and supply	
Land and Resource Use	Request for information on public access to Camp 19 Road	Section 1.5.4.11 and 1.6 of the EIS Addendum (Vol 1) ( <a href="#">CIAR #727</a> ) provides a description of the proposed changes to Camp 19 Road and the new mine site access road.  Use of Camp 19 Road will not be restricted south of the mine site and access to the shoreline of the Pic River will be maintained.
Project Design	Request for information on: <ul style="list-style-type: none"> <li>• An updated feasibility study</li> <li>• The expected life of the mine</li> <li>• The construction and operation schedule</li> <li>• Uses of palladium</li> <li>• The PSMF design including storage capacity and acid generation mitigation measures</li> <li>• Changes to the mine design</li> <li>• The amount of concentrate produced and the location of refinement (smelting) facilities</li> </ul>	The 2021 Feasibility Study ( <a href="#">CIAR #741</a> ) provides an updated mine design, including expected mine life, ore and concentrate processes, Project schedule, and Project components.  An updated description of the Project to reflect refinements to the mine design, including the PSMF, is provided in Section 1.5.4 EIS Addendum (Vol 1) ( <a href="#">CIAR #727</a> ).  The mine is expected to operate for approximately 13 years, with construction taking approximately 2 years to complete.  Uses of palladium include catalytic converters for the automobiles and the manufacturing of electronics.
Project Ownership	Request for information on the ownership change for the Project and the involvement of Sibanye-Stillwater	Section 1.2 of EIS Addendum (Vol 1) ( <a href="#">CIAR #727</a> ) provides information about GenPGM (proponent of the Project) and the joint venture with Sibanye-Stillwater.
Socio-economic	Request for information on socio-economic study	One socio-economic study has been completed to support the EIS Addendum, the Socio-economic and Current Resource Use Updated Baseline Report (Stantec, 2020g) ( <a href="#">CIAR # 722</a> ) and Section 6.2.9 of this EIS Addendum (Vol 2) assesses effects to the socio-economic environment.
Socio-economic – Housing	Request for information on the off-site accommodation complexes, including location.  Noted comment on the housing shortage within Marathon and the interest of Manitouwadge as a community looking to provide accommodations	Off-site accommodation options are still being explored, but it is anticipated that such a facility will need to accommodate approximately 250 people.  GenPGM has discussed options for the creation of an Accommodations Complex with various groups / individuals to determine an appropriate solution; however, a decision on the

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**Table 5.3-2: Key Public Issues and Responses**

Topic	Comment	Response
		location and management of this facility has not yet been confirmed.
Surface Water	<p>Request for information on:</p> <ul style="list-style-type: none"> <li>the location of PSMF (tailings).</li> <li>mitigation measures to protect surface water</li> </ul> <p>Noted, comment on preferred PSMF discharge location to not be Bamooos Lake</p>	<p>Section 6.2.3 of this EIS Addendum (Vol 2) covers the assessment of effects to water quality and quantity, including a description of changes, mitigation measures and follow-up and monitoring programs relating to water balance, surface water quality, and hydrology.</p> <p>As noted in Section 1.6 of EIS Addendum (Vol 1) (<a href="#">CIAR #727</a>), changes to the Project have been proposed to further reduce potential impacts on the Pic River watershed and Bamooos Lake.</p>
Traffic	Request for information on changes to the Camp 19 Road and Highway 17 intersection	An assessment of Project-related traffic, including changes to Camp 19 Road, were covered in the Traffic Impact Study ( <a href="#">CIAR #227</a> ) as part of the original EIS (2012). Updates on traffic volumes are provided in Sections 1.5.2 and 1.5.4.4 of the EIS Addendum (Vol 1) ( <a href="#">CIAR #727</a> ) and are further covered by Section 6.2.9 of this EIS Addendum (Vol 2).
Wildlife	Noted comment on potential effects to species at risk, including woodland caribou	The VEC assessment for wildlife (Section 6.2.7) and Species at Risk (Section 6.2.8) provided in this EIS Addendum (Vol 2) considers the potential effects of the Project on these species. Consideration of impacts on these species of importance to Indigenous communities informed the determination of significance of Project-related effects.

### 5.3.5 Plans for Ongoing Consultation

GenPGM remains committed to continuing to actively consult with the public and stakeholder organizations following submission of the EIS Addendum, throughout the Joint Review Panel hearing process, detailed design, and environmental permitting.

Key objectives of ongoing consultation with Project Stakeholders include:

- To ensure transparency about the Project’s environmental management and social responsibility, long-term monitoring, and reclamation
- To provide opportunities to identify and resolve issues collaboratively

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- To explore opportunities related to employment, economic benefits, and community benefits that contribute to the broader community objectives

Ongoing consultation activities with the public will expand to include an updated website and social media presence. Notifications of future consultation activities will be published in local newspapers and online. Regular information updates will be provided through newspaper briefs, information board and website.

GenPGM will continue to welcome and address comments received on their website, through the community information board, by mail and email, and through public consultation at its office in Marathon. The public is also welcome to participate in the Joint Review Panel hearing process. All comments and questions received will be documented with responses. Copies of the comments, questions and replies will be provided to the Joint Review Panel.

### 5.4 GOVERNMENT AGENCY CONSULTATION

The following sections broadly describe the principles and approach to consultation with government agencies undertaken by GenPGM since the Project was formally put on hold in 2014. The approach is consistent with the principles and objectives outlined in the original EIS (2012). This section outlines the approach to consultation, describes the consultation activities undertaken by GenPGM since 2014, summarizes the key issues raised during consultation, and describes plans for ongoing engagement activities.

A summary of government agency consultation activities and results from the original EIS (2012) is available in Section 4.6 and Appendix 3 of the original EIS (2012).

#### 5.4.1 Approach to Consultation

GenPGM's approach to consultation with government agencies since the restart of the Project focuses on informing agencies about changes to the Project, while gaining an understanding of policy and mandate changes to inform the preparation of the EIS Addendum. The government agency consultation strategy was developed in accordance with the following principles:

- Engaging federal and provincial agencies with an interest in the Project early in the process and working to ensure they have all the information needed to understand the Project and the assessment methods
- Identifying changes in agency guidelines, technical standards, data sources, and policies early in the process
- Notifying the government agencies about engagement opportunities early and often throughout the EA and regulatory approvals process

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### 5.4.2 Identified Government Agencies

Several federal, provincial, and municipal approvals will be required for Project construction, operations and closure. Section 1.3.4 of the EIS Addendum (Vol 1) ([CIAR #727](#)) outlines Regulatory Approvals required for the Project, and identifies the following responsible agencies:

- Fisheries and Oceans Canada (DFO)
- Environment and Climate Change Canada (ECCC)
- Transport Canada
- Natural Resources Canada (NRCan)
- Ministry of Energy, Northern Development and Mines (ENDM)
- Ministry of the Environment, Conservation and Parks (MECP)
- Ministry of Natural Resources and Forestry (MNRF)

### 5.4.3 Consultation Activities

Between 2014 and 2019, when the EIS was on hold, Stillwater and subsequently GenPGM provided annual Project updates to NRCan and the CEA Agency / IAAC.

In 2019, GenPGM started to work with government agencies to re-start the EA process. This included regular meetings throughout 2020 and 2021 with IAAC and the Crown Consultation Coordinator to discuss Project design, schedule, and ongoing consultation activities.

GenPGM undertook a series of consultation activities with government agencies to inform the EIS Addendum. A detailed summary of consultation activities completed is provided in Table 5.4-1. Additional details and copies of relevant correspondence with government agencies is provided in the updated ROC (Appendix C of this EIS Addendum [Vol 2]).

**Table 5.4-1: Government Agency Consultation Activities**

Date	Consultation Type	Topic	Summary
July 28, 2019	Notice	EIS Addendum	Notice of proponent change from GenPGM to IAAC
August 12, 2019	Notice	EIS Addendum	CEAA notice to GenPGM advising of transition from CEAA, 2012 to the Impact Assessment Act
September 27, 2019	Email	EIS Addendum	GenPGM confirmed desire to remain under the CEAA, 2012 process
May 25, 2020	Meeting	Project Schedule	GenPGM discussed Project restart and timelines with NRCan
May 29, 2020	Meeting	EIS Addendum	Discussed EA restart with IAAC, MECP, NRCan, ENDM, MNRF
Jun 2, 2020	Meeting	Project Schedule	Discussed EA restart with IAAC

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**Table 5.4-1: Government Agency Consultation Activities**

Date	Consultation Type	Topic	Summary
June 10, 2020	Meeting	Consultation	Discussed EA restart with the MECP including HO, VA, engagement, permits, etc.
June 12, 2020	Meeting	Project Design	Project updates, schedule and power supply options discussed with ENDM
June 17, 2020	Letter	EIS Addendum	GenPGM informed MECP of their intention to restart the EA process
July 13, 2020	Letter	EIS Addendum	GenPGM informed IAAC of their intention to restart the EA process
August 19-20, 2020	Technical Workshop	Project Design and Schedule  EIS Addendum	GenPGM, in conjunction with IAAC, presented a Joint Panel Review Process and Project update to the various federal and provincial agencies, including MECP, Federal Economic Development Agency for Southern Ontario, ECCC, DFO, Health Canada, ISC, Infrastructure Canada, NRCan, Public Health Agency of Canada, Transport Canada, Women and Gender Equality Canada, Employment and Social Development Canada, CIRNAC, ENDM, MNRF, MHSTCI, MLSTD.  An overview of the Joint Review Panel Process and a Project update was presented, including a technical discipline overview of previous materials and a work plan for the EIS Addendum.
October 5, 2020	Meeting	Endangered Species Wildlife	Discuss federal consideration for Caribou and Migratory Birds
October 8, 2020	Letter	Project Ownership	Outlining GenPGM and Sibanye-Stillwater relationship
October 19, 2020	Email	EIS Addendum	from IAAC identifying changes to relevant policies and guidelines to be considered
October 29, 2020	Email	EIS Addendum	from MECP identifying changes to relevant policies and guidelines to be considered
November 17, 2020	Meeting	Consultation Project Design and Schedule	Jackfish Métis and IAAC
November 26, 2020	Meeting	Consultation Project Design and Schedule	BN and IAAC
December 3, 2020	Meeting	Consultation Project Design and Schedule	PPFN and IAAC
January 27, 2021	Meeting	Consultation Project Design and Schedule	Red Sky and IAAC
January 28, 2021	Meeting	Consultation	MNO and IAAC

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**Table 5.4-1: Government Agency Consultation Activities**

Date	Consultation Type	Topic	Summary
		Project Design and Schedule	
February 12, 2021	Meeting	Consultation Project Design and Schedule	Michipicoten and IAAC
February 17, 2021	Meeting	Consultation Project Design and Schedule	Jackfish and IAAC
February 19, 2021	Meeting	Project Design and Schedule Fish and Fish Habitat Navigable Waters	IAAC, ECCC, DFO and Transport Canada MNRF
Feb 25, 2021	Meeting	Cumulative Effects	BN presents Cumulative effects
March 18, 2021	Meeting	Project Design	87 participants from IAAC, ECCC, DFO, MNRF, MTO, MECP, ENDM, MHSTC attended a virtual session to provide information about the project design

### 5.4.4 Key Issues

Consultation with government agencies focused on re-establishing the EA and Panel Review process, as well as identifying changes to applicable criteria, standards and/or thresholds to be used in the assessment of potential Project-related effects.

GenPGM is committed to working together with the Crown Consultation Coordinator to ensure clear communication and Project information sharing with communities. Key issues raised during government agency consultation for this Project have been summarized in Table 5.4-2.

**Table 5.4-2: Government Agency Comments and Responses**

Topic	Government Comment	Proponent Response
Consultation	Confirmation of Indigenous communities to be consulted Request information on an updated consultation plan Noted comment on ensuring that consultation focuses on changes to the Project since original	GenPGM/Stillwater continued to engage Indigenous Communities when the Project was on hold between 2014 and 2020. Since the Project restart, GenPGM has worked to understand concerns, answer comments and provide capacity for community participation. A detailed consultation plan is currently underway and is summarized in Section 5.4.5 of this report.

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**Table 5.4-2: Government Agency Comments and Responses**

Topic	Government Comment	Proponent Response
EA / approvals process	<p>Comments on applicable agreements, policies and guidelines for the EA process and applicable regulatory requirements</p> <p>Noted comment on including more detail within the EA to ensure a smooth regulatory approval</p>	<p>GenPGM has worked with IAAC to confirm that the Project is being assessed in accordance with CEAA, 2012. Additional details on the EA process can be found in Section 1.3 of EIS Addendum (Vol 1) (<a href="#">CIAR #727</a>).</p> <p>As part of the Project restart and consultation activities, regulatory government agencies were contacted to determine requirements for future regulatory approvals. Where possible, detailed information demonstrating conformity to these requirements have been included within the EIS Addendum. Section 1.3.4 of EIS Addendum (Vol 1) and the various VEC sections in chapter 6 of this EIS Addendum (Vol 2) identify the anticipated regulatory approvals.</p>
Fish and Fish Habitat	<p>Discussion on permitting process and which type of projects would be suitable for compensation.</p>	<p>Ongoing planning and review are underway.</p>
Wildlife	<p>Identified changes in information regarding Species at Risk and Migratory Birds, including woodland caribou.</p>	<p>The purpose of the EIS Addendum is to verify and update the original EIS (2012) to address relevant changes in baseline conditions and applicable policies/criteria for determining significance. Specifically, the Terrestrial Environment Baseline Report Update (Northern Bioscience, 2020) confirms the characterization of existing conditions with respect to wildlife, a summary of which is included in Sections 4.9 and 4.10 of the EIS Addendum (Vol 1) (<a href="#">CIAR #727</a>).</p>

## 5.4.5 Plans for Ongoing Consultation

A number of regulatory consultation requirements will need to be fulfilled as part of obtaining outstanding permits and approvals for the Project. A list of permits that are expected to be required for the Project are listed in Section 1.3.4 of EIS Addendum (Vol 1) ([CIAR #727](#)). This list will be refined through meetings with government agencies as part of the permitting process.

Topic-focused discussions with regulators is planned around identified permitting requirements and are summarized below.

- **ENDM** – Closure Planning
- **DFO** – Fisheries Compensation
- **ECCC** – Mine Rock Alternatives



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- **MNRF** – Endangered Species
- **MECP** – Water Discharge

Government agencies will be kept informed of ongoing Indigenous communications and comments that may be relevant to their associated jurisdictions and permitting requirements.

### 5.5 REFERENCES

Ecometrix Inc. 2020. Revision of the Sulphur Cut-off Value to Determine Type 1 (Non-PAG) and Type 2 (PAG) Mine Rock for the Marathon Palladium Project. Prepared for Generation PGM Inc. dated December 15, 2020

Ecometrix Inc. 2020b. [\(CIAR #722\)](#) Marathon Palladium Project – Aquatic Environment Baseline Report Update. Prepared for Generation PGM Inc. 13 November 2020.

Government of Canada. 2019. First Nation Profiles. Available at: <https://fnp-ppn.aadnc-aandc.gc.ca/fnp/Main/index.aspx?lang=eng>. Accessed: March 2021

Northern Bioscience. 2020. [\(CIAR #722\)](#) Marathon Palladium Project Terrestrial Environment Baseline Report Update. Prepared for Generation PGM Inc. 13 November 2020.

Ross Archaeological Research and Hamilton Archaeological Consulting. 2013. SID # 28) [\(CIAR #227\)](#) An Assessment of Non- Aboriginal Cultural Heritage/Built Environment/Cultural Landscape Values for the Marathon PGMCU Project Environmental Impact Statement. Prepared for Stillwater Inc.

Stantec Consulting Ltd. (Stantec). 2020b. [\(CIAR #722\)](#) Marathon Palladium Project Air Quality Updated Baseline Report. Prepared for Generation PGM Inc. 13 November 2020.

Stantec Consulting Ltd. (Stantec). 2020e. [\(CIAR #722\)](#) Marathon Palladium Project Environmental Hydrogeology Updated Baseline Report. Prepared for Generation PGM Inc. 26 November 2020.

Stantec Consulting Ltd. (Stantec). 2020g. [\(CIAR #722\)](#) Marathon Palladium Project Socio-economic and Current Resource Use Updated Baseline Report. Prepared for Generation PGM Inc. 13 November 2020.

Woodland Heritage Services Ltd. 2008. (SID # 27) [\(CIAR #227\)](#) Stage I and II Archaeological Assessment of the Marathon PGM property, north of Marathon Ontario.