

Hearing for the Marathon Palladium Project

Joint Review Panel (Ref. 54755)

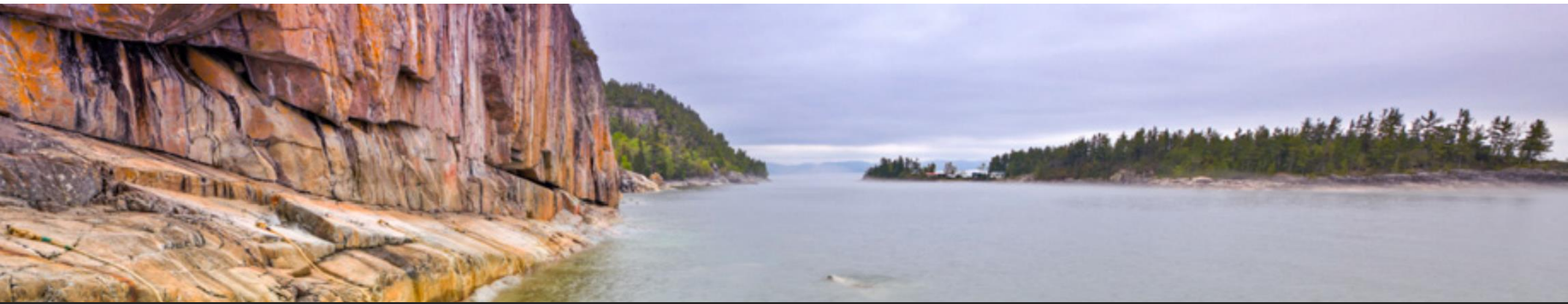
Oral Submission of
Environment North

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ENVIRONMENT north

- Founded in 1972 and based in Thunder Bay, Ontario
- Goal is to benefit the community by protecting the environment and increasing the public's understanding of environmental issues
- Strive to improve and protect ecological sustainability and the socio-economic well-being of Northwestern Ontario through leadership, research, partnerships, education, advocacy, information and capacity building



Recommendation to the Joint Review Panel

Environment North's Findings

Given the significant unresolved issues and gaps in information needed to fully assess the project and its impacts, Environment North submits the JRP is unable to opine that the project will not cause significant adverse environmental effects.

Environment North's position is that the project and ancillary activities will impact climate change through the release of greenhouse gas emissions, and climate events will also adversely affect the project, therefore:

- a) Climate change is a necessary and critical aspect of sustainable development and must be considered when assessing the project's promotion of sustainability
- b) Climate change is a relevant consideration in assessing environmental effects
- c) The public must have adequate involvement and opportunities to meaningfully participate
- d) A robust analysis of socio-economic effects is required



Climate Impacts

Promotion of Sustainable Development (1)

- In order to fulfill *CEAA 2012*'s purpose of promoting sustainability development and upholding international climate commitments, GenPGM must incorporate climate *within* sustainability
- Climate change is a development issue requiring consideration by GenPGM within its sustainability assessment. To achieve sustainability requires meeting climate commitments and preserving a viable legacy for future generations
- **Environment North finds** there is insufficient information to adequately describe, at a sufficient level of detail, that the project meets the sustainability purposes established under s. 4(1)(h) of *CEAA 2012*



Climate Impacts

Promotion of Sustainable Development (2)

- **Environment North recommends** the JRP consider if the project is aligned with sustainability by asking:
 - Does the project cause, induce, or exacerbate extreme weather events or slow onset events?
 - Does it irreversibly alter an ecosystem?
 - Does it make a community less resilient?
 - Does it affect ecological life support systems?
 - Does it sustain nature, life support systems and the community?



Climate Impacts

Environmental Effects (1)

- *CEAA 2012* requires projects be assessed “in a careful and precautionary manner to avoid significant adverse environmental effects” (section 4(1)(b))
- Climate effects are necessary environmental effects to be considered, evaluated and assessed throughout the EIS:
 - Cannot be limited to one Valued Environment Component (VEC)
 - Must consider impacts to the integrity of ecological systems
 - Risks to mining infrastructure from climate change must also be evaluated
- **Environment North finds** there is insufficient information to adequately describe, at a sufficient level of detail, that adverse environmental effects have been assessed in accordance with the purposes of *CEAA 2012*



Climate Impacts

Environmental Effects (2)

- **Environment North finds** GenPGM failed to consider climate impacts within its proposed mitigation measures and follow-up programming, for instance:
 - Mitigation measures should be specific to greenhouse gas emissions and accompanied by tracking, robust monitoring and evaluation to gauge efficacy
 - Adaption requires all project components (from construction through to decommissioning) be evaluated against climate forecasts and modelling
 - Impacts which can be neither mitigated nor adapted to means GenPGM must be responsible for its greenhouse gas emissions in line with the polluter-pays principle



Climate Impacts

Environmental Effects (3)

- **Environment North recommends:**

- Documents be updated to report on all, not some, of the greenhouse gases to be reportable in accordance with the *United Nations Framework Convention on Climate Change* (ie. carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride and nitrogen trifluoride)
- GenPGM be required to report GHGs to Environment and Climate Change Canada as part of the federal *Greenhouse Gas Reporting Program* given the stated interest of the public in this project and its climate impacts



Socio-economic Impacts

Meaningful Public Participation

- Meaningful public participation throughout the Project is imperative to ensure inclusion of community values from the outset of project scoping through identification and interpretation of VECs, anticipated effect of Project activities, identification of mitigation strategies, determination of residual significance ratings, to mine closure and thereafter
- ‘Informing’ the public does not denote, nor reflect the concept of meaningful public participation which requires relationship building and collaboration to bring forth the community values critical for long term success of the project, avoidance of conflict and constrained relations with the nearby communities as well as confidence in the process
- **Environment North finds** there is insufficient information to adequately find “meaningful public participation” was provided for in accordance with the purposes of *CEAA 2012*



Socio-economic Impacts

Community Perspectives

- EA needs to incorporate divergent public/community perspectives given the potential for adverse as well as beneficial effects that can have for long term consequences and the implications for community well-being
- GenPGM relies on terminology which conveys assumption and conjecture: *‘may also result in’*, *‘predicted to not be significant’*, *‘may also be incompatible with land use plans and zoning’*, *‘may affect nearby landowners’*, *‘has the potential to affect harvesting activities’*, *‘could increase competition for species’*
- **Environment North finds** GenPGM has not provided a robust evaluation process necessary to identify potential socio-economic effects early in the process and determine the appropriate response before there are serious and / or irreversible impacts

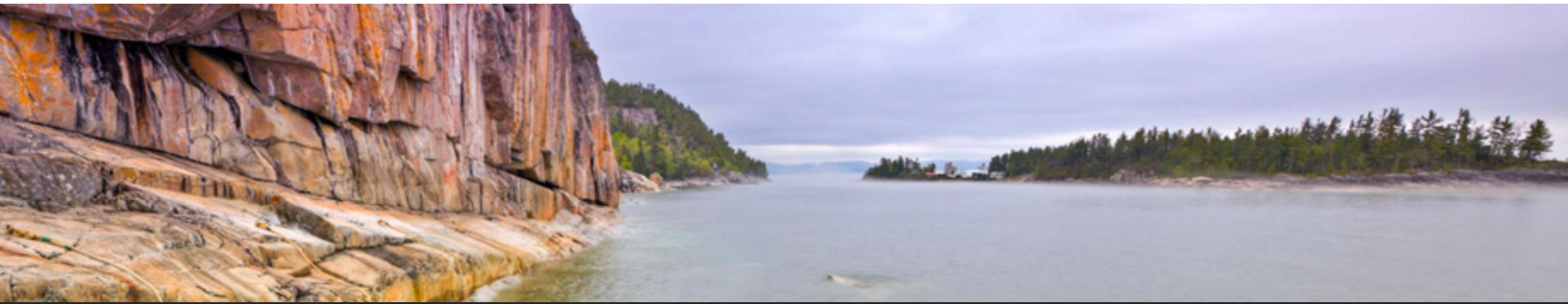


Socio-economic Impacts

Cumulative Effects

- Cumulative effects needs to consider changes caused by past, present and future human activities and natural processes.
- A project specific lens is not adequate to determine the incremental effects from past, present and future human actions to which the GenPGM will contribute:
 - Scant attention has been given to other projects occurring in the region such as the East-West Transmission Tie-Line and proposed projects like the North Shore Gas Project involving Marathon, Terrace Bay, Schreiber, Manitouwadge and Wawa
- **Environment North finds** there is insufficient information regarding past, present and future activities that collectively could cause adverse effects to the environment and people, contrary to section 4(1)(i) of *CEAA 2012* that encourages the study of cumulative effects





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Thank you

<http://www.environmentnorth.ca/>

