

# **Appendix D**

## **Response to Summary of Issues**



**Appendix D  
Crawford Nickel Project – Response to Summary of Issues**

ID	COMMENT	RESPONSE
<b>Accidents and Malfunctions</b>		
1	Need for information on measures to prepare for and prevent accidents and malfunctions and the release of hazardous materials, including spills, during all Project phases. Need for information on emergency response plans and procedures to respond to any accidents, malfunctions, and spills.	CNC will establish emergency response plans and procedures for the Project prior to construction, that meet regulatory needs. In addition, the development of appropriate environmental management plans is one of the anticipated mitigation measures that will be discussed in the Impact Statement for malfunctions and accidents, if an Impact Assessment is required.
2	Heightened concerns from an Indigenous community about the potential for a tailings dam breach. Concern with adequacy of alternatives.	<p>The tailings storage facility will be designed to meet the Canadian Dam Association Dam Safety Guidelines and will take into consideration climate change. In addition, the key features of the tailings management include:</p> <ul style="list-style-type: none"> <li>• The use of thickened tailings to reduce the water content in the tailings storage facility;</li> <li>• The use of exhausted open pits to safely store tailings; and,</li> <li>• Operational controls, including regular inspections, dam safety assessments and dam safety reviews</li> </ul> <p>Preliminary geochemical analyses and water quality modelling indicate that tailings will not be acid generating.</p> <p>An emergency response plan will be developed prior to construction to address the potential for a tailings dam breach based upon a detailed dam breach analysis to be carried out, and will be provided in the Impact Statement, if an Impact Assessment is required.</p> <p>Further, a comprehensive assessment of alternatives for the tailings storage facility will be provided in the Impact Statement, if an Impact Assessment is required. The assessment will be conducted to meet Environment and Climate Change Canada requirements outlined in the Guidelines for the assessment of alternatives for mine waste disposal, as required under the Metal and Diamond Mining Effluent Regulations.</p>
3	Need for mitigation measures to address potential accidents and malfunctions related to transportation and storage of dangerous goods. Nickel concentrate may be a dangerous good regulated under the <i>Transportation of Dangerous Goods Act</i> .	<p>All shipments will follow regulatory requirements, including the <i>Transportation of Dangerous Goods Act</i> and associated regulations. The potential for environmental effects associated with malfunctions and accidents on the trucking route will be minimized by following operational procedures which may include:</p> <ul style="list-style-type: none"> <li>• Regular maintenance of fuel trucks and other transport vehicles;</li> <li>• Speed limits are to be strictly adhered to, including on site;</li> <li>• Strict adherence to national trucking hour limits and other applicable requirements;</li> <li>• Drivers will be required to meet all applicable regulatory training requirements, be trained in spill response procedures for the materials they transport, and carry the appropriate safety data sheets; and</li> <li>• All vehicles transporting materials to site will be required to maintain a supply of emergency response equipment, including communication equipment, first aid materials and a fire extinguisher</li> </ul> <p>An emergency response plan will address the primary hazardous materials on site, including procedures for spill response on the trucking route to the Project. Emergency response materials to be maintained in vehicles will be identified in the emergency response plan but are likely to include absorbent materials and equipment to contain spilled substances.</p> <p>The management of potential accidents and malfunctions applicable to the Project will be presented in the Impact Statement, if an Impact Assessment is required.</p>
4	Need for information about plans for communication with local residents in cases of accidents and malfunctions, including translation into local Indigenous languages.	Prior to construction of the Project, a communication protocol will be established with residents and local Indigenous Nations. If deemed appropriate in discussion with the individual Indigenous Nations, CNC may prepare plain language summaries of these plans, including translation to Indigenous languages if requested.
<b>Acoustic Environment</b>		
5	Potential effects from increased noise levels and vibration from the Project on recreational activity, including camping. As one example, concern about whether noise and vibrations will be perceptible at Bigwater Campground.	The tailings management facility associated with the Project is located approximately 20 km from Bigwater Campground and noise and vibration is not anticipated to be perceptible at that distance. However, noise and vibration modelling will be completed as part of the Impact Statement, if an Impact Assessment is required, to assess the potential effects. Practical mitigation measures will be utilized to limit the potential effect on human receptors and recreational activities in the area.
6	Concern about effects from increased noise levels due to a higher frequency of flights at the Timmins municipal airport causing noise pollution in the region.	As the workforce is anticipated to be drawn from local communities and given the readily available access to surface transportation routes (highways and rail lines), it is not anticipated that there will be an increase in flight traffic due to the Project. As a result, it is not anticipated that there will any increased noise from air traffic.
7	Concerns about the effects of noise from rail operations on wildlife and harvesting.	An assessment of potential effects of noise on wildlife will be based upon noise modelling conducted for the Project, and will be presented in the Impact Statement, if an Impact Assessment is required.

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8	Need for further information on methods the Proponent will use to monitor noise emissions, and thresholds beyond which additional measures would be implemented to manage noise.	Noise modelling will be completed as part of the Impact Statement, if an Impact Assessment is required, and mitigation measures may be implemented to ensure Provincial guidelines (Environmental Noise Guideline NPC-300) will be met. If warranted, noise will be monitored during construction and operation, and activities may be modified to ensure that Provincial requirements are being met.
<b>Alternative Means of the Project</b>		
9	Request for information on any alternative means for carrying out the Project that would minimize habitat loss and overprinting of tributaries of the North Driftwood and West Buskegau Rivers.	Further detail regarding alternative means for carrying out the Project will be provided in the Impact Statement, if an Impact Assessment is determined to be required. These alternatives will be consulted upon and the analysis will consider habitat loss and overprinting of tributaries of the North Driftwood and West Buskegau Rivers.
10	Need for information on alternative corridors for the new transmission line corridor, relocated Highway 655, rail spur, and relocated 500kV line, prior to stating the preferred alternatives.	Information on the considered alternative alignments for linear infrastructure are discussed in Section C.6 of the Detailed Project Description. In general, alternative routings involved alignments to the east and west of the project, which would result in a larger overall project footprint. The indicated preferred alignment maintains a more compact project footprint.
<b>Atmospheric Environment (e.g. air quality)</b>		
11	Potential changes to air quality, from fugitive emissions, point source emissions and fuel combustion. Of particular note is the potential for chrysotile (asbestos) to be present in dust as a result of its presence in bedrock.	Potential changes to air quality due to the Project will be assessed in the Impact Statement, if an Impact Assessment is required.
12	Need for further information on changes to air quality, including baseline conditions, emissions estimates, dispersion modelling, human receptor locations, and cumulative impacts, for many parameters. Need to assess presence of chrysotile and the potential effects of chrysotile in dust.	Air quality modelling will be completed to support the assessment of potential changes in air quality as part of the Impact Statement, if an Impact Assessment is required. The modelling will include a summary of baseline conditions, emission estimates, dispersion modelling, receptor locations and cumulative changes in air quality for identified parameters.
13	Need for information on proposed mitigation measures to manage changes to air quality, including best management practices, and monitoring plans. Need to determine if extra measures are required to manage chrysotile in airborne dust.	Air quality modelling will be completed as part of the Impact Statement, if an Impact Assessment is required, to assess the potential effects on air quality and support the development of applicable management and monitoring plans.
14	To help inform tailored assessment requirements, (optionally) provide, in the Detailed Project Description, a more specific comparison of air emission sources for each phase of the Project, and planned mitigation. Pending the information provided, a tailored assessment could focus on some phases more than others.	Air quality modelling will be completed to support the assessment of potential changes in air quality as part of the Impact Statement, if an Impact Assessment is required. The modelling will include a summary of air emission sources and take into consideration planned mitigation measures associated with minimizing the effects on air quality due to Project activities.
15	Potential for effects on Indigenous peoples, if traditional practices continue where air quality changes occur. To help inform tailored assessment requirements, (optionally) define, in the Detailed Project Description, what is meant by the "project limit" where applicable ambient air quality criteria will be met. Confirm there will be no receptors within that boundary. Provide details about provincial oversight that will ensure compliance with air quality criteria at that boundary. Alternately, if traditional practices may be permitted within that boundary (for example, if it is an extra-large property boundary that extends well beyond the project area and an agreement is made to enable access), a tailored assessment would include effects on receptors within the boundary.	The preliminary project boundary provided in the DPD encompasses the proposed site footprint. Additional evaluations will be carried out to determine if and where the project boundary may need to be adjusted such that provincial air quality criteria are met, when any proposed design and mitigation measures are considered, and receptors are not affected. The final project boundary will be maintained as compact as possible. Compliance is assessed with both modelling and in-field measurements, and annual reporting is a requirement of the provincial Environmental Compliance Approval (Air and Noise).
16	Concerns about impacts on the environment from wind dispersal of tailings.	Air quality modelling will be completed as part of the Impact Statement, if an Impact Assessment is required, to assess the potential effects of wind dispersal of tailings on air quality and support the development of applicable mitigation measures. Also note that the ability of the tailings to capture carbon once exposed to air also tends to bind particles together in the TMF. This cementation process will further reduce airborne dust issues.
17	Request to have input to a site dust management plan including any use of chemical suppressants.	Air quality modelling will be completed as part of the Impact Statement, if an Impact Assessment is required, to assess the potential effects of dust on air quality and support the development of dust management plan during permitting. Engagement activities will be conducted around mitigation measures and management plans, per interest.
18	Concerns about whether there is any potential for changes to air quality at Bigwater Campground.	The tailings management facility associated with the Project is located approximately 20 km from Bigwater Campground and changes in air quality are not anticipated at that distance. Air quality modelling will be completed as part of the Impact Statement, if an Impact Assessment is required, to assess the potential for effects on air quality and support the development of applicable mitigation measures to meet provincial requirements (e.g., Ontario Regulation 419/05 and other guidelines as may be applicable).
<b>Climate Change and Greenhouse Gas Emissions (GHGs)</b>		
19	Need for further information on how the Project will be carbon neutral.	<p>A more detailed assessment of options that could result in a carbon neutral operation and the proposed path forward will be presented in the impact statement, if an impact assessment is required.</p> <p>At this stage, the plan is to focus first on reducing the emissions, including technologies such as electric rope shovels and trolley-assisted haul trucks, combined with the readily available green energy in Northern Ontario.</p> <p>Secondly, the geological properties of the Crawford Project include a natural ability for some of the minerals, predominantly brucite, to sequester carbon from the atmosphere. Laboratory scale studies have indicated a potential passive capture rate greater than Crawford's anticipated emissions on a tonne of carbon dioxide per tonne of nickel metric, with these rates further enhanced by a new process at the research stage known as In-Process Tailings (IPT) Carbonation.</p> <p>For more information, please see the CNC press release for IPT Carbonation at <a href="https://canadanickel.com/wp-content/uploads/2022/07/220719-In-Process-Carbonation-News-Release.pdf">https://canadanickel.com/wp-content/uploads/2022/07/220719-In-Process-Carbonation-News-Release.pdf</a>.</p>
20	Comment about the use of diesel-fired generation during the construction phase, closure phase (decommissioning phase), and emergencies, and the need to ensure nitrogen dioxide and other greenhouse gas emissions do not exceed regulatory guidelines.	Diesel is anticipated to be required primarily during the construction phase and for emergency power during operations/closure. Line power is expected to be used throughout operations and closure. NOx/GHG contributions will be modelled as part of Impact Statement, if an Impact Assessment required.

ID	COMMENT	RESPONSE
<b>Decommissioning and Reclamation</b>		
21	Need for further information on decommissioning and reclamation plans at the mine site, including duration of monitoring, water, soil, and waste management.	The closure plan will be developed according to the requirements laid out in Ontario Regulation 240/00 and the included Mine Rehabilitation Code of Ontario and will be consulted upon. The duration of monitoring will also be based on the provincial regulation and the results from the consultation of stakeholders, and is anticipated to continue until the stated closure objectives have been met.
22	Request for reassurance that funds are in place for closure costs and to understand how they are calculated.	Third-party closure costs are estimated as part of development of a regulatory Closure Plan, which is required to be filed with Ministry of Mines prior to any development/construction activities occurring. Financial assurance is provided to Ministry of Mines prior to the Closure Plan being filed.
23	Request for information on waste disposal sites on Crown land following decommissioning.	Domestic and special management / hazardous materials resulting from the construction and operation of the Crawford Project will be periodically shipped off site to appropriate facilities. A demolition landfill may be established on-site for disposal of non-hazardous demolition wastes during the closure phase. Further details on the demolition landfill will be determined through additional engineering currently underway.
<b>Effects of the Environment on the Project</b>		
24	Potential effects of climate change on the safety, resilience, and effectiveness of water and tailings management infrastructure, water-dependent decisions and water quality during all Project phases and post-closure (abandonment phase), including the effects of storms and extreme heat events. Need to provide a list of water management infrastructure and processes that are vulnerable to climate change.	A climate study has been prepared specifically for the Crawford project to estimate the potential impacts of climate change until 2080. The design of key infrastructures such as water management infrastructures and the TMF will take into account the potential effects of climate change on temperature and precipitations, and more specifically on extreme weather events. A detailed assessment of the effect of climate change on the Project will be included in the impact statement, if an impact assessment is required.
25	Need for information on water-dependent mitigation measures related to the effects of the environment on the Project, including how climate change will be incorporated into the design of water and tailings management infrastructure.	The design criteria for water and tailings management infrastructure will take into account the potential effects of climate change. A detailed assessment of the effect of climate change on the Project will be included in the impact statement, if an impact assessment is required.
26	Concern about impacts of extreme climate events on source water courses. Consider this in source water course selection and plan to adapt.	Process water will be obtained primarily by recycling site runoff and open pit mine water. If additional fresh water is required for process make up and a fire water supply, it may be sourced from a local watercourse. Further information on the requirement for additional water, the anticipated volumes and the selection of candidate watercourses will be provided in the Impact Statement, if an Impact Assessment is required.
<b>Fish and Fish Habitat</b>		
27	Potential effects on fish and fish habitat from the destruction of tributaries, diversion of watercourses, reduced flow in watercourses downstream of the mine, and use of waterbodies for mine waste disposal.	A number of watercourses are expected to be overprinted (fully or partially) by Project components as a result of development. A fish habitat offsetting and compensation plan will be developed to mitigate the potential effects to fish habitat, with new habitat created to replace that which is overprinted. Where possible, flows will be redirected to a point downstream of the Project such that flow reductions are minimized. As a result, there will be no overall net impact to fisheries resources.
28	Need detailed mapping of each water feature, detailed fish habitat characterization, fish population baseline data, analysis of changes to the flow regime and fish dependency on flow, standard and site- specific mitigation, an assessment of alternatives for mine waste disposal, and a plan to offset effects. To help inform tailored assessment requirements, (optionally) provide, in the Detailed Project Description, a more detailed map of affected water courses, an estimate of destroyed fish habitat in square meters, an estimate of the length of the zone of impact on flows, the currently known fish species distribution, and standard mitigation that will be implemented.	Baseline aquatic investigations have been ongoing in the area since 2021, and will be summarized in the Impact Statement, if an Impact Assessment is required. Further detail will be provided in the Impact Statement related to potential effects on fish and fish habitat. In addition, a plan for fish habitat offsetting and compensation will be developed which will be consulted upon and approved through a rigorous federal process, and when implemented, will mitigate effects to aquatic resources including fish habitat loss.
29	Need for information about the potential watercourse diversion route. To help inform tailored assessment requirements, confirm the diversion will be reconnected within the North Driftwood River watershed, or present plausible alternatives.	The current water management plan involves two main water diversions. The first one includes the diversion of the lakes located west of the TMF to the North Driftwood River north of the site, as shown on Figure C.2. Water south of the TMF is also diverted in a general northeast direction to the West Buskegau river. Further information on potential watercourse diversions will be provided in the Impact Statement, if an Impact Assessment is required.
30	Potential for effects on Lake Sturgeon, suckers, and spawning areas from construction of pipeline and effluent discharge in Mattagami River. In addition, there are unconfirmed reports of Lake Sturgeon in the lower stretches of the North Driftwood River. Need for information on the current and historical distribution of Lake Sturgeon to support the assertion that impacts are not anticipated. Need for information on potential mitigation.	Ongoing baseline investigations have included fish community studies in the North Driftwood River and have not identified evidence of Lake Sturgeon in this watercourse. The results of these studies will be presented in the Impact Statement, if an Impact Assessment is required. Further, an assessment of potential effects on fish and fish habitat, including Lake Sturgeon, will be provided in the Impact Statement, along with potential mitigation measures, as necessary. In addition, fish community study results from surveys provided by the MNR do not include the presence of Lake Sturgeon within the reach of the Mattagami River downstream of the Lower Sturgeon dam.
31	Concern about potential effects of blasting and seismic activity on waterbodies and aquatic life.	The potential effects of blasting and vibration on aquatic resources will be assessed against regulatory guidelines, and presented in the Impact Statement, if an Impact Assessment is required. Blasting activities will follow the DFO guidance for use of explosives near waterbodies.
32	Concerns about potential effects on fish and fish habitat from deposition of fugitive dust, sedimentation downstream of the Project site, nitrogen released from explosives, and seepage and runoff from ore, mine rock, tailings, and overburden.	The potential effects on fish and fish habitat will be assessed in the Impact Statement, if an Impact Assessment is required. Air quality modelling will be conducted to estimate the deposition of fugitive dust around the Project, and will be considered in the assessment of effects on fish habitat. Further, water quality modelling will be undertaken to predict changes in water quality parameters due to Project activities, and the results of this modelling will be considered in the assessment of fish habitat. The results of the assessment will be considered in the development of mitigation and management plans for the protection of fish and fish habitat.
33	Concern about requirements for relocation of fish and the methodology to be used.	Additional information on the requirement for fish relocation and potential methods will be provided in the Impact Statement, if an Impact Assessment is required. A comprehensive fish removal program will be detailed through the future environmental approvals process in discussion with the Ministry of Natural Resources and Forestry.



ID	COMMENT	RESPONSE
34	Potential effects on fish and fish from the construction and operation of water crossings (including Victoria Creek) along the highway and transmission realignment and new rail spur. To help inform tailored assessment requirements, provide, in the Detailed Project Description, information about potential water crossing locations, the currently known fish species distribution, and planned mitigation.	The preliminary locations of watercourse crossings have been included in the Detailed Project Description. Water crossings will be designed to minimize impacts to fish habitat and to provide fish passage where necessary. Detailed engineering during the permitting phase will consider design criteria such as grades, inlet/outlet pools where appropriate, embedment of culverts and substrate.
<b>Human Health and Well-being (including of Indigenous peoples)</b>		
35	Potential effects on human health from Project emissions to the environment.	The potential effects on human health from Project emissions to the environment will be assessed in the Impact Statement, if an Impact Assessment is required. The potential for generation of air and noise emissions will be fully considered in the final Project design and will be based in part on air dispersion modelling to be completed to support regulatory requirements (see DPD Section F.5).
36	Need to evaluate potential effects from biophysical pathways of exposure such as: <ul style="list-style-type: none"> <li>· air emissions (including inhalation of chrysotile);</li> <li>· changes to drinking and recreational water quality (including effluent discharge and seepage);</li> <li>· changes to country food quality; and</li> <li>· noise (including transportation routes).</li> </ul> This would inform a human health risk assessment which would inform the need for mitigation and follow-up. Use Health Canada's Environmental Assessment Guidance for: Air Quality, Noise, Drinking and Recreational Water, Country Foods and Human Health Risk Assessment.	A human health risk assessment will be conducted for the Project, in accordance with Health Canada guidance, and consider relevant biophysical pathways of exposure and applicable provincial and federal guidelines. The potential effects on human health from Project emissions to the environment will be assessed in the Impact Statement, if an Impact Assessment is required. The results of the assessment will be considered in the development of mitigation and management plans and if warranted, a preliminary approach to environmental monitoring. Human health risk issues will be reviewed and corresponding information gathered in collaboration with Indigenous Peoples to ensure both direct and perceived human health impacts are understood and assessed and validated on a community level, and represented appropriately (see DPD Section F.5).
37	Need to collect and provide robust information about Indigenous land use activities (approximate locations, frequency, duration) to identify sensitive receptor locations for the evaluation of effects from biophysical pathways of exposure and the human health risk assessment.	CNC is collaborating with local Indigenous Nations to support the development of TK/TLU studies, facilitated by the IA Process Agreements where appropriate which, once made available as appropriate, will be incorporated into the Impact Statement, if an Impact Assessment is required. Relevant information on sensitive receptors will be considered in the evaluation of biophysical pathways for the human health risk assessment.
38	To help inform tailored assessment requirements, (optionally) provide, in the Detailed Project Description, maps or information about: <ul style="list-style-type: none"> <li>· the three seasonal-use properties and hunting blind already identified, including type of use (and whether Indigenous), whether they will remain available for use, and any source of water supply;</li> <li>· the three alternative locations for effluent discharge and any nearby drinking or recreational water uses;</li> <li>· a narrative about whether there is any potential for water quality changes to be perceptible at the drinking water intake for the town of Smooth Rock Falls;</li> <li>· any other known human receptors within an approximate zone of effect from the Project;</li> <li>· distance to other sensitive receptors like hospitals and schools; and</li> <li>· possible receptors of increased noise along transportation routes, including the new rail spur, existing Kidd rail line, and roads (if traffic volumes will change).</li> </ul>	Further information on potential sensitive receptors will be included in the Impact Statement, if an Impact Assessment is required. Baseline information collected on local recreational land use and community infrastructure, as well as Indigenous traditional land use will be considered in the evaluation of biophysical pathways for the human health risk assessment. Available information on seasonal-use properties is included in the DPD, shown on Figure D.3.
39	Concern raised about effluent discharge to Mattagami River upstream of the water intake structure for the town of Smooth Rock Falls.	Effluent discharge to the environment will meet regulatory requirements. The Project is located approximately 50 km upstream of the Town of Smooth Rock Falls, however an assessment of the potential changes in water quality due to effluent discharge will be provided in the Impact Statement, as appropriate, if an Impact Assessment is required. During the provincial permitting process, it is anticipated that discharge limits will be developed, incorporating the assimilative capacity of the receiver, for the protection of aquatic life within a relatively short distance from the discharge point. As such, at a distance of 50 km from the discharge point, it is anticipated that there will not be a quantifiable change in water quality from existing conditions.
40	To help inform tailored assessment requirements, provide a list of predicted air emissions for all Project activities and for all Project phases.	A list of predicted air emissions for Project activities will be prepared for the air quality modelling to be conducted for the Project. The air quality modelling inputs and results will be included in the Impact Statement, if an Impact Assessment is required.
41	Need the cumulative effects assessment on human health to include non-threshold substances such as fine particulate matter and nitrogen dioxide.	An assessment of potential effects on human health will be conducted as part of the Impact Statement, if an Impact Assessment is required. If there are residual effects, after the application of mitigation measures, an assessment of cumulative effects will be conducted and presented in the Impact Statement.
42	Need to consider potential impacts on country foods through sulphate runoff from mine components which can influence methylmercury bioavailability.	Surface runoff that comes into contact with mine-related facilities will be collected in ditches and ponds to be pumped to the primary collection pond. Seepage from impoundments will be collected in ditches and channeled to the collection ponds. Through this integrated water management system, site effluent will meet all regulatory requirements before being discharged safely to the environment. If necessary, an effluent treatment plant may be installed for additional treatment to ensure effluent quality can be consistently achieved. Results of geochemical assessments to date have indicated no risk of acid mine drainage and low levels of metal leaching. Geochemical programs are ongoing to confirm these results. As a result, potential impacts on country foods will be minimized, however a human health risk assessment, incorporating country foods information from TK/TLU studies where available, will be conducted and presented in the Impact Statement, if an Impact Assessment is required.
43	Need to validate health risk modelling assumptions with Indigenous peoples, such as country food consumption rates.	The human health risk assessment model will be prepared based on available consumption rates, which may include information from TK/TLU studies from local Indigenous Nations and/or applicable literature from northern Ontario. The modelling results will be presented in the Impact Statement, if an Impact Assessment is required. Information received from Indigenous Nations feedback and/or subsequent TK/TLU studies will be incorporated into a revised model, if received.

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44	Concern expressed about the potential for bioaccumulation given that Indigenous peoples harvest large-bodied fish from the downstream environment. Request for baseline information and the plan to monitor fish and wildlife tissue for contaminants throughout the duration of the Project.	Effluent from the mine will meet all regulatory requirements prior to discharge, including the Metal and Diamond Mining Effluent Regulations (MDMER). Baseline investigation for fisheries in Project waterbodies is ongoing to determine existing contaminants present in fish tissue, and will be summarized in the Impact Statement, if an Impact Assessment is required. The information will be used to support fish tissue monitoring carried out during operations as required under regulatory approvals and the Metal and Diamond Mining Effluent Regulations.
45	Potential effects on human health from accidents and malfunctions such as spills and accidental releases.	Potential spills and accidental releases will be minimized through design and construction features and by following procedures outlined in the spill response plan. Design features may include construction of tanks and storage areas with recognized industry standards, maintaining safe distances between storage areas and sensitive habitat and watercourses and constructing contaminant berms around storage tanks. In addition, operational procedures will be incorporated into the environmental management systems, including regular inspections of all storage areas. In the event of spill, the spill response plan will come into effect with a focus on ensuring human health and safety is protected.
46	Concern that increased road and rail traffic could affect the health and safety of Indigenous peoples. Request for a transportation strategy to address volume and transport of dangerous goods.	A human health impact assessment will be conducted that considers the increased road and rail traffic directly associated with the Project and presented in the Impact Statement, if an Impact Assessment is required. The TK/TLU studies will inform identification of concerns relating to specific traffic related issues for Indigenous Peoples, and the development of appropriate mitigation and monitoring measures, if required. If necessary, a transportation strategy pertaining to the volume and transportation of good and serves, in line with CNC's Health and Safety Policy, will be considered.
47	Concern related to appropriate signage indicating proximity to active mine site for those accessing surrounding areas.	CNC will add appropriate signage indicating proximity to active mine site for those accessing surrounding areas during the construction, operation and closure of the Project.
48	Concerns about the impact of COVID-19 outbreaks at the Project site on the limited medical capacity of the region, based on past outbreaks in Timmins that were affected by mining projects.	During periods deemed necessary by internal evaluation of regional COVID statistics and/or public health requirements or guidelines, CNC has and will continue to employ precautionary measures, when necessary, to ensure workplace safety. CNC has engaged with the Porcupine Health Unit and will continue to follow their guidance in relation to COVID-19.
49	Comment that Métis men over the age of 50 are a high-risk group for dying of COVID-19. Concern about increased travel to the area. Request for information about vaccination and screening protocols.	<p>During periods deemed necessary by internal evaluation of regional COVID statistics and/or regulatory requirements or guidelines, CNC has and will continue to employ precautionary measures, when necessary, to ensure workplace safety, including: mandatory temperature screening, mandatory PPE as appropriate for each worksite and task, and required proof of double vaccination.</p> <p>In addition, as the workforce is anticipated to be drawn from local communities and given the readily available access to surface transportation routes (highways and rail lines), it is not anticipated that there will be an increase in travel to the area due to the Project.</p>
50	Need for further information on potential environmental, economic, social and cultural project-related impacts on human health, using Health Canada's interim Health Impact Assessment guidance.	A health impact assessment will be conducted in accordance with Health Canada guidance, to consider potential environmental, economic, social and cultural project-related impacts on human health directly associated with the Project and presented in the Impact Statement, if an Impact Assessment is required (see DPD Section D.8.4 and F.5). It is also understood that if required, information will be gathered in collaboration with Indigenous Peoples to understand specific social, economic, environmental, and cultural impacts on community members for detailed assessment. This is designed to be a collaborative and inclusive process to ensure that each community is well represented, and the diversity of issues is both recognized and understood.
51	Comments on the need to engage directly with Indigenous communities to establish baseline health conditions.	CNC is collaborating with local Indigenous Nations to support the development of Nation-specific socio-economic studies, facilitated by the IA Process Agreements where appropriate, which, once made available as appropriate, will be incorporated into the Impact Statement, if an Impact Assessment is required.
52	Comment about stress from fear of accidents and malfunctions which can be alleviated through emergency preparedness plans.	<p>Key components of an emergency response plan will be included in the Impact Statement, if an Impact Assessment is required. The emergency response plan will include:</p> <ul style="list-style-type: none"> <li>• A risk assessment to identify events that may result in emergencies associated with the Project;</li> <li>• An emergency contact list;</li> <li>• A description of the roles and responsibility associated with the emergencies;</li> <li>• A list of resources need to effectively respond to emergencies;</li> <li>• A communication plan to inform employees, the public and other stakeholders; and,</li> <li>• A written procedures and actions to be undertaken as required during an emergency.</li> </ul> <p>Prior to construction of the Project, the emergency response plan will be updated with further detail.</p>

ID	COMMENT	RESPONSE
53	Potential impacts of increased substance misuse, including opioids, in the labour force and associated impacts on vulnerable populations and health care services. Comment about links between migrant worker populations for large resource extraction projects and addictions. Comment that no-drug and no-alcohol policies lead to overindulgence during time off. To help inform tailored assessment requirements, (optionally) provide, in the Detailed Project Description, additional context about the opioid crisis currently being experienced in northern Ontario, any potential pathways of effects from the Project (negative or positive), and preliminary thinking about measures that could help manage effects. This could enable early discussion about complementary measures, if warranted.	<p>A health impact assessment will be conducted that considers the potential effects for increased substance misuse on vulnerable populations and health care services and will be presented in the Impact Statement, if an Impact Assessment is required.</p> <p>Additional context on the Opioid crisis and potential pathways is provided in DPD Section D.8.4.</p> <p>CNC's Community Contributions program, developed in consultation with community social, economic, and municipal representatives from the Local Procurement and Community Contributions Committee, aims at addressing social, educational, environmental, and health/wellbeing challenges, with particular emphasis on vulnerable populations, in the long and short term. Long Term contributions will be favoured towards those challenges that may be triggered or amplified by development of the Crawford Project to contribute towards impacts mitigation or management. This process is aimed at addressing underlying factors that predispose mining workers (short and long-term) to substance abuse issues across Northern Ontario. Substance abuse issues are considered via their direct impacts on workplace injury, stresses related to mine work conditions and subsequent impacts on issues related career progression, finance, racism and/or interpersonal conflicts. Indirect impacts are also considered such as issues pertaining to mental health and wellness and family conflict.</p>
54	Request for a workplace policy addressing racism towards Indigenous peoples and to develop cultural awareness. Request to incorporate land acknowledgements into the workplace culture.	<p>CNC has a Respect in the Workplace –Workplace Harassment, Sexual Harassment and Discrimination Policy and a Workplace Violence policy, which address CNC's commitment providing a work environment that is free from discrimination, harassment and reprisals, and supportive of the productivity, dignity, and self-esteem of every employee. This includes prohibition of harassment and discrimination on the basis of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, age, record or offences, marital status, family status, or disability.</p> <p>Canada Nickel is collaborating with several Indigenous Nations at this time to develop engagement strategies appropriate to each individual Nation.</p>
<b>Indigenous Participation Opportunities</b>		
55	Request from Indigenous communities to have a ceremony to acknowledge that mining is occurring on their traditional land.	Canada Nickel is collaborating with several Indigenous Nations at this time to develop engagement strategies appropriate to each individual Nation, with a current focus on exploration activities and project permitting, and development of agreements relevant to the operation and construction of the Crawford Project. Activities relating to the initiation of construction at the Crawford Project, including ceremonies, will be discussed at a date in closer proximity to those activities.
56	Request for information on funding opportunities by the Proponent for Indigenous communities to participate in project activities.	<p>CNC has signed Impact Assessment Process Agreements with Indigenous Nations to support full, meaningful participation in the IA Process. These Agreements include, but are not limited to, provision of funding: to support completion of TK/TLU and socio-economic studies, to support community engagement activities, and for formation of an IA Committee made up of community representatives, including youth, land-users, and elders. The Agreements further address participation in baseline programs, community engagement expectations, and support for site visits.</p> <p>Funding relating to project activities occurring during construction and operation will be addressed in the agreements determined appropriate by each Indigenous Nation, including but not limited to Impacts and Benefits Agreements.</p>
57	Request for appropriately-funded Indigenous, community-specific Traditional Land and Resource Use studies and cumulative effects assessments, which should be validated by Indigenous communities, and should incorporate knowledge from community Elders.	CNC has signed Impact Assessment Process Agreements with Indigenous Nations to support full, meaningful participation in the IA Process. These Agreements include, but are not limited to, provision of funding: to support completion of TK/TLU and socio-economic studies, to support community engagement activities, and for formation of an IA Committee made up of community representatives, including youth, land-users, and elders. The Agreements further address participation in baseline programs, community engagement expectations, and support for site visits.
58	Request for Proponent to work with Indigenous communities to improve recruitment and retention of Indigenous women in the industry.	Employment and Training opportunities will be addressed in the agreements determined appropriate by each Indigenous Nation, including but not limited to Impacts and Benefits Agreements.
59	Need to describe opportunities for Indigenous participation in the collection and validation of environmental baseline data.	CNC has signed Impact Assessment Process Agreements with Indigenous Nations to support full, meaningful participation in the IA Process. These Agreements include, but are not limited to, provision of funding: to support completion of TK/TLU and socio-economic studies, to support community engagement activities, and for formation of an IA Committee made up of community representatives, including youth, land-users, and elders. The Agreements further address participation in baseline programs (including the sharing of baseline workplans, schedules, reports, and the participation in study field work), community engagement expectations, and support for site visits.

ID	COMMENT	RESPONSE
60	Request for participation in environmental studies, assessments, and decisions, including: <ul style="list-style-type: none"> <li>· identifying area of potential significance for archaeological studies (e.g. the shoreline of the Mattagami River and any tributaries);</li> <li>· collecting baseline and long-term monitoring of fish, including sturgeon and other game fish used as country food such as walleye, pike, and trout;</li> <li>· assessing impacts to walleye spawning locations;</li> <li>· planning for aquatic habitat offsetting measures that are focused on communities' interests;</li> <li>· collecting and validating environmental baseline data such as water flows, water quality; air quality; and</li> <li>· providing input to decisions about water crossing locations; effluent discharge locations; water management and waste management; water intake locations; dust management plan and any use of chemical suppressants.</li> </ul>	CNC has signed Impact Assessment Process Agreements with Indigenous Nations to support full, meaningful participation in the IA Process. These Agreements include, but are not limited to, provision of funding: to support completion of TK/TLU and socio-economic studies, to support community engagement activities, and for formation of an IA Committee made up of community representatives, including youth, land-users, and elders. The Agreements further address participation in baseline programs (including sharing of baseline workplans, schedules, and reports, and participation in study field work), community engagement expectations, and support for site visits.  CNC is collaborating with local Indigenous Nations to support the development of TK/TLU studies, facilitated by the IA Process Agreements where appropriate, which, once made available as appropriate, will be incorporated into the Impact Statement, if an Impact Assessment is required. Relevant information received from Indigenous Nations feedback and/or subsequent TK/TLU studies will be incorporated into environmental studies, assessments, and decisions, if received.
61	Request to conduct an independent review of the plans for waste and tailings management.	Review of proposed project design and operation elements will be addressed, as appropriate, by both the IA Process Agreement, and by the agreements determined appropriate by each Indigenous Nation, including but not limited to Impacts and Benefits Agreements.
62	Request to participate in provincial permitting applications (e.g. Environmental Compliance Approval, Permit to Take Water) and ongoing compliance monitoring.	Participation in project permitting and ongoing compliance monitoring will be addressed by, as appropriate, both the IA Process Agreement, and by the agreements determined appropriate by each Indigenous Nation, including but not limited to Impacts and Benefits Agreements.
63	Request to provide input to any site-specific Closure Plans, including decommissioning of ground water wells, water treatment ponds, and water management infrastructure on site.	Review of proposed project Closure Plans and associated elements will be addressed, as appropriate, by both the IA Process Agreement, and by the agreements determined appropriate by each Indigenous Nation, including but not limited to Impacts and Benefits Agreements.
64	Request to provide input to the final land use plans of the site, and to incorporate native species.	Review of proposed project Closure Plans and associated elements will be addressed, as appropriate, by both the IA Process Agreement, and by the agreements determined appropriate by each Indigenous Nation, including but not limited to Impacts and Benefits Agreements.
65	Request to participate in fish relocation activities.	Participation in fish relocation activities will be addressed, as appropriate, by both the IA Process Agreement, and community engagement meetings, and by the agreements determined appropriate by each Indigenous Nation, including but not limited to Impacts and Benefits Agreements.
<b>Indigenous Engagement and Consultation</b>		
66	Engagement activities must be respectful of Indigenous protocols, including any existing Consultation and/or Engagement Protocols that Indigenous communities have shared with the Proponent.	Canada Nickel intends to continue engagement activities with Indigenous Peoples, with an emphasis on open, respectful dialogue, and clear communication channels. Engagement activities will be conducted in a method appropriate and unique to each Nation's interests, expectations, and, if applicable, protocols.
67	Comments on the need for the Proponent to meaningfully address all concerns raised by Indigenous communities through the life of the Project.	Canada Nickel intends to continue engagement activities with Indigenous Peoples, with an emphasis on meaningful participation. Comments provided by Indigenous Nations will be fully considered and responded in a meaningful manner throughout the life of the Project.
68	Need for information on the Proponent's engagement with Indigenous communities to date, including any issues raised by Indigenous communities, and the Proponent's schedule for future engagement with Indigenous communities.	Section B.2.3 of the Initial Project Description includes a summary of engagement activities undertaken and planned, and the main issues raised during those activities to date, including during the development of the Project Description.
69	Request from certain Indigenous communities for increased engagement. Request to engage Apitipi Anicinapek Nation.	Canada Nickel is in discussion with Apitipi Anicinapek Nation.
70	Comments on alternative methods of consultation the Proponent could use to engage with Indigenous communities who have not yet responded about the Project (e.g. offline engagement, in-person correspondence, direct phone calls and letters).	Canada Nickel has issued additional correspondence to those communities who have not yet responded, while being conscious of ongoing, community-specific concerns or shutdowns relating to COVID-19 and in-person communications. CNC will remain open to use alternative methods that are community-specific, based on new feedback received, if any.
71	Request for Indigenous participation in site visits.	Indigenous participation, including site visits, for the Project has been ongoing and will continue where there is interest. To date, this has included site visits with the IA Committee for multiple Nations, and participation of Indigenous Peoples in multiple baseline field programs on site, including terrestrial and aquatic programs.
72	Request for plain language information on tailings management and other project components.	CNC has and will continue to provide plain language information on project components in the preferred format where there is interest.
<b>Indigenous Peoples' Current Use of Lands and Resources for Traditional Purposes</b>		
73	Potential for effects on hunting, trapping, fishing, gathering, and spiritual and cultural practices, including: <ul style="list-style-type: none"> <li>· loss of traditional lands (e.g. from large project footprint and overprinting waterbodies);</li> <li>· loss of access to traditional lands (e.g. from potential changes to navigability);</li> <li>· reduced resource availability (e.g. from habitat loss, habitat degradation, mortality and disturbance) on resources such as moose, geese, ducks, sturgeon, Black Ash, berries, medicinal plants;</li> <li>· changes to the experience of access and use (e.g. from noise due to mining, trains and increased flights; and changes to visual landscape from tall mine components);</li> <li>· changes to locations of practice due to perceived risks near mining; and</li> <li>· loss of knowledge related to harvesting, spiritual, and cultural practices, which can reduce hunting and gathering efficacy.</li> </ul>	CNC is collaborating with Indigenous Nations to support the development of TK/TLU studies (inclusive of land and resource use), facilitated by the IA Process Agreements where appropriate, that will inform the evaluation of potential effects on the current use of lands and resources for traditional purposes in the Impact Statement, if an Impact Assessment is required.
74	Need for Indigenous knowledge and information about traditional land and resource use (e.g. use of water bodies; and presence of rare plants.)	CNC is collaborating with Indigenous Nations to support the development of their TK/TLU studies (inclusive of land and resource use), facilitated by the IA Process Agreements where appropriate, that will inform the understanding of traditional land and resource use and the evaluation of potential effects in the Impact Statement, if an Impact Assessment is required.



ID	COMMENT	RESPONSE
75	Concerns about potential impacts on fishing, harvesting, and navigation due to potential changes to water quantity and quality of the Mattagami River, North Driftwood River, and the West Buskegau River resulting from dewatering or effluent discharge.	An assessment of potential effects on the current use of lands and resources for traditional purposes will be presented in the Impact Statement, if an Impact Assessment is required. The assessment will be supported with the results of the analysis related to changes in surface water quality and quantity, the potential effects on fish and fish habitat, terrestrial resources and navigation, and incorporate relevant information from Indigenous Knowledge studies provided by Indigenous Nations, where appropriate.
76	Need to consider traditional uses when selecting effluent discharge location, including freshwater stores, aquatic species, local occurrence of hunting and fishing.	Effluent from the mine will meet all regulatory requirements prior to discharge, including the Metal and Diamond Mining Effluent Regulations (MDMER). However, an assessment of alternatives will be provided in the Impact Statement, if an Impact Assessment is required. Relevant information from Indigenous Knowledge studies provided by Indigenous Nations will be incorporated into the selection of the effluent discharge location.
77	Concern about contamination of traditional medicinal plants and berries.	CNC is collaborating with Indigenous Nations to support the development of their TK/TLU studies (inclusive of land and resource use) that will inform the evaluation of potential effects in the Impact Statement, if an Impact Assessment is required. The results of the assessment will be considered in the development of mitigation and management plans.
78	Concerns about increased pressure on fish and wildlife harvesting in the area due to an influx of workers, and increased access into traditional hunting areas.	As the workforce is anticipated to be drawn from local communities, it is not anticipated that there will be an increase in recreational hunting or fishing activities in the area due to the Project. Should it be deemed necessary at the time of construction and operation, CNC will, where possible, avoid opening new land access beyond the site footprint, and will collaborate with the appropriate authorities and Indigenous Nations to manage potential hunting and fishing activities related to site workers.
79	Concern related to appropriate signage indicating proximity to active mine site for those accessing surrounding areas.	CNC will add appropriate signage indicating proximity to active mine site for those accessing surrounding areas during the construction, operation and closure of the Project.
80	Concerns about hunt camps and traplines, and the ability to hunt and trap available resources, due to construction of transportation corridors and cumulative effects with forestry.	An assessment of potential effects on the current use of lands and resources for traditional purposes will be presented in the Impact Statement, if an Impact Assessment is required. The assessment will be informed by feedback received through engagement with Indigenous People and TK/TLU studies provided by Indigenous Nations. The results of the assessment will be considered in the development of appropriate mitigation and management plans.
81	Concern about impacts on the ability of future generations to hunt, fish, harvest, and gather due to the longevity of the effects of the Project.	An assessment of potential effects on the current use of lands and resources for traditional purposes will be presented in the Impact Statement, if an Impact Assessment is required. The results of the assessment will be considered in the development of appropriate mitigation and management plans to limit long-term effects on the ability of future generations to hunt, fish, harvest, and gather.
<b>Indigenous Peoples' Social and Economic Conditions</b>		
82	Need for further information on whether Indigenous peoples and/or businesses in proximity to the Project will receive prioritized employment or business opportunities.	Canada Nickel implemented a local procurement policy, developed in consultation with the Local Procurement and Community Contributions Committee, stating that, during the exploration phase of the Crawford Project, CNC will, to the maximum extent possible while ensuring safety, quality, and economy, give preference to goods and services provided by local companies after initial preference to Indigenous owned and operated businesses, or business with Indigenous joint ventures or partnerships. This policy will be amended and adapted to the construction and operation phases of the project as appropriate.  Indigenous business opportunities during construction and operation will be addressed in the agreements determined appropriate by each Indigenous Nation, including but not limited to Impacts and Benefits Agreements.
83	Need for further information (e.g. description and quantification) on economic and employment opportunities for Indigenous communities (e.g. Indigenous hiring strategy, anticipated number and type of jobs, skill requirements for those jobs, barriers for career advancement, investment in training and skills enhancement to support career advancement).	Employment and training will be addressed in the agreements determined appropriate by each Indigenous Nation, including but not limited to Impacts and Benefits Agreements.
84	Comments recommending that the Proponent engage with Indigenous Skills and Employment Training (ISET) service delivery providers throughout the Project.	Canada Nickel will continue engagement activities with interested Indigenous organizations, such as the Indigenous Skills and Employment Training.
85	Comment that the Skills and Partnership Fund (SPF) is a project-based program that funds partnerships to provide skills training. There may be opportunities in 2022-2023 to leverage training with Indigenous communities.	Applicability of the Skills and Partnership Fund for workforce preparation relating to the Crawford Project will be evaluated at a period closer to construction and operation of the Project, at which time it will be discussed with the involved Indigenous Nations.
86	Comments expressing concern about the long-term economic viability of the Project and that anticipated benefits may not be realized if Project is halted, but environmental effects remain.	Third-party closure costs are estimated as part of development of a regulatory Closure Plan, which is required to be filed with Ministry of Mines prior to any development/construction activities occurring. Financial assurance to support closure and reclamation activities is provided to Ministry of Mines prior to filing the Closure Plan.
87	Need for further demographic information on Indigenous peoples in the region, including population details. Comment to add information about proximity to major highways or roads to help assess accessibility for employment. Provide a description of the demographics of Apitipi Anicinapek Nation using available information.	Baseline socio-economic conditions, including demographic details for local Indigenous Nations will be provided in the Impact Statement, if an Impact Assessment is required. Available information on Apitipi Anicinapek Nation is provided in Section D.8 of the DPD.
88	Suggestion to consider building an accommodation camp so that Indigenous employees would not have to commute from reserves.	An accommodations complex is not proposed to be developed as part of the Crawford Project due to the close proximity of local communities.
89	Need for further information on the baseline social context, and associated potential effects of the Project on local Indigenous communities' social conditions.	Information collected on behalf of Indigenous communities regarding socio-economic conditions will be provided to CNC for analysis and inclusion in the Impact Statement, if an Impact Assessment is required. Information collected and shared with CNC will be designed and directed by the Indigenous Nations independently, and all integration efforts related to the assigned material by CNC will be validated by communities upon completion. As a result of the assessment, mitigation and management measures will be developed, as necessary, for implementation during the construction, operation and closure phases of the Project.

ID	COMMENT	RESPONSE
90	Need for further information on mitigation measures to address social impacts of the Project (e.g. housing availability and costs, anticipated pressures on health and childcare services, women's shelters, mental health and addictions, increased crime rates and discrimination).	An assessment of potential effects on the social environment from the Project will be provided in the Impact Statement, if an Impact Assessment is required. As a result of the assessment, mitigation and management measures will be developed for implementation during the construction, operation and closure of the Project.
91	Potential for family traditions to be abandoned for employment. Comments on the need for flexibility in work schedules to enable the continued participation by community members in traditional and cultural activities (e.g. family hunts, large family gatherings).	Employment conditions will be addressed in the agreements determined appropriate by each Indigenous Nation, including but not limited to Impacts and Benefits Agreements.
<b>Indigenous Peoples' Spiritual, Physical, and Cultural Heritage</b>		
92	Potential impacts to cultural heritage and archaeological resources near the project area.	An assessment of potential effects on cultural heritage and archaeology will be presented in the Impact Statement, if an Impact Assessment is required. An appropriate management plan will be developed prior to construction. Relevant information from Indigenous TK/TLU studies, once provided by Indigenous Nations, will be used to inform further cultural heritage and archeology studies.
93	Need for further information on the cultural heritage environment of the Project, including planned, ongoing, or completed archaeological assessments.	A Cultural Heritage Report and Stage 1 Archaeological Assessment were completed for the area around the Project in 2021. The Cultural Heritage Report determined that there are no identified impacted resources, and no further study is warranted. The Stage 1 Archaeological Assessment identified areas of higher potential to be investigated during a Stage 2 field investigation. Relevant information from Indigenous TK/TLU studies, once provided by Indigenous Nations, will be used to inform further cultural heritage and archeology studies.
94	Need a cultural heritage report including potential effects on known built heritage resources and cultural heritage landscapes, and measures to avoid or mitigate effects. Need for further information on whether the Project could impact underwater archaeological resources.	A Cultural Heritage Report was completed for the area around the Project in 2021, and determined that there are no known built heritage resources and cultural heritage landscapes. As a result, the need for mitigation measures is not required and no further study is warranted. Relevant information from Indigenous TK/TLU studies, once provided by Indigenous Nations, will be used to inform the potential effects of the Project on Indigenous Peoples cultural heritage.
95	Comments on the identification of a potential burial ground in the north end of the project area.	The identification of a potential burial ground in the north end of the Project area will be investigated during the Stage 2 archaeology assessment field program, pending further information on the location. The results of the Stage 2 archaeology assessment will be incorporated in the assessment of potential effects along with applicable mitigation measures and presented in the Impact Statement, if an Impact Assessment is required. Relevant information from Indigenous TK/TLU studies, once provided by Indigenous Nations, will be used to inform the potential effects of the Project on Indigenous Peoples cultural heritage.
96	Comment that waterways were important travel routes and the discovery of archaeological resources can be anticipated. Comments on previous archeological studies and artifact discovered in the project area, including near Flint Creek.	Indigenous Knowledge, for which studies are ongoing, to be incorporated into the field investigation for the Stage 2 archaeology assessment once made available to CNC. The results of the Stage 2 archaeology assessment will be incorporated in the assessment of potential effects along with applicable mitigation measures and presented in the Impact Statement, if an Impact Assessment is required.
97	Request to review any studies used to assess the potential presence of physical or cultural heritage features.	Baseline workplans and preliminary results are circulated with Indigenous Nations, facilitated by the IA Process Agreements as appropriate. Baseline Reports, once finalized, are shared with Indigenous Nations. Relevant information from Indigenous TK/TLU studies provided by Indigenous Nations will be incorporated into further studies, as required.
98	Request for information from the Proponent on the findings from initial archaeological studies, including information about the methods used to assess First Nations and Métis artifacts.	Baseline workplans and preliminary results are circulated with Indigenous Nations, facilitated by the IA Process Agreements as appropriate. Baseline reports, once finalized, are shared with Indigenous Nations. Relevant information from Indigenous TK/TLU studies provided by Indigenous Nations will be incorporated into further studies, as required.
99	Request for Indigenous peoples to be involved in archaeological studies (e.g. inclusion of elders, site visits, use of maps).	The baseline workplans and preliminary results of studies, when available, are circulated with Indigenous Nations associated with the Project. Archeological study information, including workplans and final reports, will continue to be circulated as appropriate. Feedback received from Indigenous Peoples, as well as relevant findings from the Indigenous TK/TLU studies, will be considered in subsequent archaeology studies for the Project. Maps to support acquisition of this feedback and completion of studies have been shared. There will be opportunities for Indigenous Peoples to participate in Stage 2 field investigations, and an archeologist recommended by the Indigenous Nations has been integrated into the archeology program Stage 2 field investigations.
100	Comments on the need for the Proponent to include areas for Indigenous employees to engage in traditional practices on site (e.g. tobacco offerings, smudging area).	Employment conditions will be addressed in the agreements determined appropriate by each Indigenous Nation, including but not limited to Impacts and Benefits Agreements.
<b>Indigenous Peoples' Exercise of Aboriginal and/or Treaty Rights</b>		
101	See sections on Current Use of Lands and Resources for Traditional Purposes, Human Health and Well-being; and Spiritual, Physical and Cultural Practices.	Acknowledged.
102	Request that the Detailed Project Description be clearer that all Indigenous peoples engaged by the proponent (e.g. First Nations, Métis, and Inuit) have constitutionally protected rights under section 35 of the <i>Constitution Act, 1982</i> .	Canada Nickel is engaging Indigenous Nations with the understanding that activities related to the Crawford Project may impact their protected Aboriginal and/or Treaty rights.

ID	COMMENT	RESPONSE
<b>Migratory Birds and their Habitat, Species at Risk and their Habitat, and other Flora and Fauna</b>		
103	<p>Potential effects on migratory birds and their habitat, including habitat loss, habitat alteration or fragmentation, mortality, or disturbance due to site alteration, vegetation clearing, vehicle operation, accidents and spills, and increased noise levels and light pollution, during all Project phases. To help inform tailored assessment requirements, (optionally) provide, in the Detailed Project Description:</p> <ul style="list-style-type: none"> <li>· a list of migratory birds known to occur, and with the potential to occur, in areas to be affected by the Project, based on available information;</li> <li>· a general estimate of the quantity and quality of migratory bird habitat that would be lost, and the extent to which it is limiting in the broader area; and</li> <li>· specific mitigation measures that would avoid mortality and disturbance, including a justification for specific timing windows with pre-construction assessments for presence, and anything that can be said about management of ambient light and accidents and spills.</li> </ul>	<p>Available information on avian species as a result of baseline investigation conducted has been included in the Detailed Project Description. Baseline investigations conducted in 2021 and 2022 for migratory birds and their habitat, as well as an assessment of potential effects from the Project will be provided in the Impact Statement, if an Impact Assessment is required. As a result of the assessment, mitigation and management measures will be developed for implementation during the construction, operation and closure of the Project.</p>
104	<p>Potential effects on species at risk and their habitat and species of importance to Indigenous peoples, from disturbance and habitat alteration or loss.</p>	<p>Potential effects on species at risk and their habitat, and species of importance to Indigenous peoples from Project impacts due to habitat disturbance, alteration or loss will be described in the Impact Statement, if an Impact Assessment is required.</p>
105	<p>Need for the federal and provincial listing for each of the species of conservation concern that are mentioned in the Initial Project Description or in these comments.</p>	<p>The federal and provincial listing for each of the species of conservation concern has been updated in Section D.7.7 of the Detailed Project Description.</p>
106	<p>Need to identify species of particular importance to Indigenous peoples, through collection of additional Indigenous knowledge and perspectives.</p>	<p>CNC is collaborating with Indigenous Nations to support the development of Indigenous TK/TLU studies, facilitated by an IA process agreement as appropriate, and will incorporate this knowledge into the Impact Statement, once made available as appropriate, if an Impact Assessment is required. These self-driven studies are designed to indicate species of particular importance to each respective community, ensuring a diversity of perspectives at a local and/or regional level.</p>
107	<p>Need for baseline information on species at risk and species of importance to Indigenous people at the Project site, including seasonal and annual variation, distribution, and habitat use. Need for mitigation measures for potential effects, and an assessment of residual effects.</p>	<p>CNC is collaborating with Indigenous Nations to support the development of Indigenous TK/TLU studies, facilitated by an IA process agreement as appropriate. An assessment of potential effects on species at risk and species of importance to Indigenous people at the Project site, as well as suitable mitigation measures will be included in the Impact Statement, if an Impact Assessment is required.</p>
108	<p>To help inform a tailored assessment, (optionally) provide, in the Detailed Project Description, further information on presence or absence of individuals, residences and important habitat, for species at risk identified through previous or future desktop studies and field observations. Important habitat could include federal Critical Habitat or provincial General Habitat and Regulated Habitat. Some examples of helpful information are provided throughout five rows below.</p>	<p>Further information on species at risk arising through baseline investigations conducted to date has been included in the Detailed Project Description.</p>
109	<p>Potential effects on birds and bats of conservation concern that are relatively likely to occur in the region, including:</p> <ul style="list-style-type: none"> <li>· Little Brown Myotis, Northern Myotis, and Tricolored Bat (including bat maternity roosts);</li> <li>· Bald Eagle (including stick nests);</li> <li>· Canada Warbler;</li> <li>· Common Nighthawk;</li> <li>· Olive-Sided Flycatcher;</li> <li>· Yellow Rail;</li> <li>· Whip-poor-will; and</li> <li>· Evening Grosbeak.</li> </ul> <p>To help inform tailored assessment requirements, (optionally) provide, in the Detailed Project Description:</p> <ul style="list-style-type: none"> <li>· currently available information about species presence and important habitat presence, from your continued monitoring, engagement and desktop analyses; and</li> <li>· a description about how potential effects to these species and their important habitat would typically be managed on private and provincial Crown land, including specific breeding bird timing windows with pre-construction assessments to verify likely absence, other mitigation measures for migratory birds and bats, and through any provisions in the Ontario <i>Endangered Species Act</i> or <i>Species at Risk Act</i>.</li> </ul>	<p>Further information on species at risk as a result of baseline investigation conducted to date has been included in the Detailed Project Description. Baseline investigations conducted in 2021 and 2022 for species of conservation concern and their habitat, as well as an assessment of potential effects from the Project will be provided in the Impact Statement, if an Impact Assessment is required. As a result of the assessment, mitigation and management measures will be developed for implementation during the construction, operation and closure of the Project.</p>
110	<p>Potential effects on Barn Swallow, Bobolink, and Red-headed Woodpecker, if they are present. To help inform tailored assessment requirements, (optionally) provide, in the Detailed Project Description:</p> <ul style="list-style-type: none"> <li>· specific information about the potential for presence and any known occurrences, including validation with local experts; and</li> <li>· a description about how potential effects to these species and their important habitat would typically be managed on private and provincial Crown land, if the species are present.</li> </ul>	<p>Barn Swallow, Bobolink and Red-headed Woodpecker have not been observed in the area around the Project. Should evidence of the presence of these species become available through the current baseline studies, effects on these species will be assessed in the Impact Statement, if an impact Assessment is required. As a result, an assessment of the potential effects of the Project on these specific species is not deemed relevant.</p>

ID	COMMENT	RESPONSE
111	<p>Comment received that some species are unlikely to be present in the project area and may not require further study, including:</p> <ul style="list-style-type: none"> <li>· Blanding's Turtle;</li> <li>· Peregrine Falcon;</li> <li>· Bank Swallow;</li> <li>· Monarch; and</li> <li>· Yellow-banded Bumble Bee.</li> </ul> <p>To help inform tailored assessment requirements, consider rationale for whether to undertake further studies, based on available information and all comments received, and validate with other commenters as appropriate. Provide rationale in the Detailed Project Description. For Bank Swallow, provide information about appropriate aggregate and soft stockpile face management practices that can be used to prevent future establishment.</p>	<p>Baseline information collected from field investigations in 2022 is incorporated into Section D.7.7 Species of Conservation Concern of the Detailed Project Description. The Detailed Project Description includes rationale for the removal of species from the list included in the Initial Project Description. An assessment of potential effects on Bank Swallow will be included in the Impact Statement, if an Impact Assessment is required.</p>
112	<p>Potential for effects on Woodland Caribou, critical habitat, and recovery goals for the Kesagami caribou range. Specifically, potential for increases to range-scale "disturbance" levels, as well as potential for effects within the range on "existing habitat", "biophysical attributes" currently present, connectivity between important habitat types, and predator/prey access to "undisturbed" habitat. Potential need to offset effects to habitat that can't otherwise be mitigated. Note: In the Kesagami Range, all habitat (disturbed or not) is critical habitat. Acknowledging the low potential for caribou presence in the local project area at present time, additional information could help clarify the scope of potential effects and narrow down the required information and studies.</p> <p>To help inform tailored assessment requirements, (optionally) provide, in the Detailed Project Description:</p> <ul style="list-style-type: none"> <li>• a clear map showing where the Project overlaps the Kesagami caribou range;</li> <li>• a description of the potential occurrence of caribou Project near the Project site including highway, transmission lines, rail spur, and potential 10 km pipeline. Summarize available information from provincial data sets about the Kesagami caribou population as well as local Indigenous and community knowledge. If caribou are considered locally absent, provide rationale and your level of certainty;</li> <li>• information on the presence of critical habitat in any areas that could potentially be affected by the Project, using definitions in the <u>Amended Recovery Strategy</u>. Explicitly address whether the biophysical attributes of caribou critical habitat occur within and around the mine site and linear Project components, taking into account Appendix H of the <u>Amended Recovery Strategy</u>; and</li> <li>• a description, with general rationale, of the potential for effects on caribou, critical habitat, and caribou recovery efforts within the Kesagami Range over the short, medium, and long- term including the post-mine closure landscape. Compare to how the area might contribute to recovery efforts in the absence of the Project.</li> </ul>	<p>The Kesagami Range for Woodland Caribou has been added to the Detailed Project Description (Figure C.1) Available baseline information on the presence of Woodland Caribou and their habitat adjacent to the Project is presented in Section D.7.5.2. Detailed baseline information, , as well as the potential effects as a result of the Project will be included in the Impact Statement, if an Impact Assessment is required.</p>
113	<p>Potential effects on Black Ash, which is widespread, common, but in decline due to an invasive beetle. To help inform tailored assessment requirements, (optionally) provide, in the Detailed Project Description, more specific information including:</p> <ul style="list-style-type: none"> <li>· a description of the extent to which Black Ash may be present and impacted (including a desktop analysis of relevant eco-sites, if warranted); and</li> <li>· a description about how potential effects to Black Ash would typically be managed, including provisions in the Ontario <i>Endangered Species Act</i>.</li> </ul>	<p>Potential effects on Black Ash from the construction of the Project will be assessed in the Impact Statement, if an Impact Assessment is required.</p>
114	<p>Potential effects of metals in fugitive dust on vegetation and wildlife. Need for information on mitigation measures, follow-up program measures to manage uncertainty, and monitoring plans to prevent adverse effects of metal exposure in fugitive dust.</p>	<p>The potential effects on vegetation due to fugitive dust will be based on air quality modelling and assessed in the Impact Statement, if an Impact Assessment is required. Based on the results of the assessment, mitigation and monitoring plans will be developed for implementation during the construction and operation of the Project.</p>
115	<p>Potential effects of habitat loss beyond the direct Project footprint, for species identified as important to Indigenous people such as moose, geese, deer, hare, and beaver.</p>	<p>Potential effects on species of importance to Indigenous people due to indirect habitat loss will be assessed in the Impact Statement, if an Impact Assessment is required. Mitigation measures and an appropriate monitoring program will be established based on the results of the assessment of effects.</p>
116	<p>Potential effects to the existing northern flyway for geese and ducks.</p>	<p>Potential effects on migratory birds such as geese and ducks due to indirect habitat alteration will be assessed in the Impact Statement, if an Impact Assessment is required. Mitigation measures and an appropriate monitoring program will be established based on the results of the assessment of effects.</p>
117	<p>Potential effects on moose and moose habitat from construction and relocation of Highway 655, transmission lines, and rail line, and operation of new rail line. Potential changes to wolf locations and behaviour as a result of the Project, and subsequent impacts on moose.</p>	<p>Potential effects on moose due to direct and indirect habitat loss will be assessed in the Impact Statement, if an Impact Assessment is required. Mitigation measures and an appropriate monitoring program will be established based on the results of the assessment of effects.</p>
118	<p>Concerns about effects on wildlife from vehicular traffic on roads, including reptiles, amphibians, birds, and mammals. Concerns about wildlife migration and wildlife corridors, and the need for measures to enable safe crossing of service roads.</p>	<p>Potential effects on wildlife due to indirect habitat alteration of corridors and mortality will be assessed in the Impact Statement, if an Impact Assessment is required. Mitigation measures and an appropriate monitoring program will be established based on the results of the assessment of effects.</p>
119	<p>Request for information on measures that would be put in place to prevent loss of life for mammals attempting to return to previously occupied habitat that is no longer safe and suitable.</p>	<p>Baseline information on wildlife movement corridors and the potential effects on wildlife due to mortality will be included in the Impact Statement, if an Impact Assessment is required. Mitigation measures will be established based on the results of the assessment of effects.</p>
120	<p>Request for additional information on provincially rare plant species identified in the project area, and measures to preserve or protect them.</p>	<p>Baseline information on provincially rare plant species, along with applicable mitigation measures for the protection and preservation of these species will be included in the Impact Statement, if an Impact Assessment is required.</p>



ID	COMMENT	RESPONSE
121	Request for information on mitigation measures that would be used to control invasive or noxious species in the project area or along access points.	Applicable mitigation measures for the control of invasive or noxious species within the Project footprint will be included in the Impact Statement, if an Impact Assessment is required.
122	Concern raised that there is heightened value to this land and the services it provides as it is a greenfield site near a conservation area.	Ongoing baseline investigations will be reviewed to determine if there are any environmental sensitivities associated with the terrestrial environment. An assessment of potential effects on terrestrial resources will be conducted and presented in the Impact Statement, if an Impact Assessment is required. Mitigation measures necessary for the protection of environmental sensitive species or values will be implemented based on the results of the assessment of the effects, and if necessary an appropriate monitoring program will be developed established. It should be noted that, while this is a greenfield mining site, the area has been subject to heavy logging.
<b>Navigation and Navigable Waters</b>		
123	Potential effects on navigable waters and navigation by Indigenous peoples. Need to provide information about the navigability of waterways, the traditional use of waterways for navigation, potential effects on navigation, and proposed mitigation measures. To help inform tailored assessment requirements, (optionally) provide, in the Detailed Project Description: <ul style="list-style-type: none"> <li>· information about all water crossings and works involving navigable waterways, including the highway relocation, rail spur, pipeline alternatives, and mine site;</li> <li>· identification of water bodies that are obviously navigable or obviously not navigable (with supporting rationale) and which bodies still require a determination of navigability; and</li> <li>· identification of project activities that could possibly affect navigation.</li> </ul>	Previous and current navigation of waterways by Indigenous Peoples will be determined in Indigenous TK/TLU studies, and relevant findings will be used to inform the evaluation of potential effects. The navigability of waterbodies in the Project area and potential effects to navigation due to direct or indirect effects to local watercourses and waterbodies will be assessed in the Impact Statement should an Impact Assessment be required. Further, CNC intends to engage with Transport Canada on requirement under the Act.
124	Comment with suggestion to engage Transport Canada on all requirements under the <i>Canadian Navigable Waters Act</i> to avoid project delays.	Comment acknowledged. CNC has held a preliminary meeting with Transport Canada and intends to continue to engage with Transport Canada on requirements under the Act.
<b>Need for the Project</b>		
125	Comment in support of critical mineral projects going ahead.	Comment acknowledged.
126	Comments in support of the Project, citing the opportunity to share wealth with impacted communities while also mitigating effects.	Comment acknowledged.
<b>Project Activities and Design</b>		
127	Concerns about the large Project footprint and requests to minimize it to the extent possible.	Site layout has been designed to maintain as compact a footprint as possible given the scope of the Project. This has been accomplished by: <ul style="list-style-type: none"> <li>• maximizing the disposal of tailings in the exhausted open pits,</li> <li>• avoiding the encroachment of lakes to the west of the tailings management facility,</li> <li>• limiting the impact on the West Buskegau and Jocko Creek watersheds,</li> <li>• avoiding encroachment on the Mahaffy Conservation Reserve,</li> <li>• the avoidance of overprinting West Buskegau River and Jocko Creek, and</li> <li>• improving the stability of the design of the tailings management facility through ground improvements to optimize the volumes deposited.</li> </ul> This will be further optimized during detailed engineering, based on design criteria and planning.
128	Concerns over the physical stability and dimensions of the Tailings Storage Facility. Request for more information on its design and efforts to minimize its size.	The tailings storage facility will be designed to meet the Canadian Dam Association Dam Safety Guidelines and will take into consideration climate change, to ensure long-term stability. In addition, the key features of the tailings management include: <ul style="list-style-type: none"> <li>• The use of thickened tailings to reduce the water content in the tailings storage facility;</li> <li>• The use of exhausted open pits to safely store tailings; and,</li> <li>• Operational controls, including regular inspections, dam safety assessments and dam safety reviews</li> </ul> Efforts have been made to reduce the TMF footprint, such as by maximizing the disposal of tailings in the exhausted open pits, and improving the stability of the tailings management facility through ground improvements to optimize the volumes deposited.
129	Request for additional information on design of stockpiles and effectiveness of water management infrastructure to prevent release of contaminants, including location of the run of mine ore stockpile.	The site layout is shown on Figure C.1. Collection ditches will be constructed to ensure contact runoff water and seepage is captured, then treated as required to meet discharge criteria (established in the provincial permitting process) before discharge to the environment.
130	Need information about the alternatives for effluent discharge locations that are under consideration.	Canada Nickel is currently investigating potential effluent discharge locations, including the Mattagami River, North Driftwood River and/or West Buskegau River, or a potential combination of watercourses. An assessment of alternative locations will consider various factors in ultimately selecting the preferred location. Baseline information will be used to support the analysis, and will presented in the Impact Statement, if an Impact Assessment is required. Currently, the Mattagami River is the preferred alternative for the operations phase of the project (with no specific concerns raised), with smaller discharges to the North Driftwood and West Buskegau during the construction phase.

ID	COMMENT	RESPONSE
131	Need for information on locations of any proposed sources of aggregate on site (using maps), and provide information to demonstrate that operation is considered in the effects assessment.	The primary material to be used for site construction will be mineral wastes (overburden and mine rock) removed from the open pit area. A sand and gravel deposit located within the property boundary, which has historically been used as a source of aggregate, may be utilized. This deposit is shown on FIGURE C.1. Other sources of aggregate might be needed during the construction phase, before the Crawford Project can produce the material (mineral wastes) needed. These sources can be either pits and quarries currently in operation by third parties, new operations by third parties or new operations developed and operated by Canada Nickel. It is not yet known where the aggregate material would be coming from, but it is expected to come from the Timmins/Cochrane area.
132	Request for the power supply to the site to use as much existing infrastructure as possible. Need for information on whether the 230 kV transmission line will use new or existing right of way, and the extent to which existing right of way would be expanded. Need information on land ownership, and responsibility for operating and maintaining (including vegetation management) the 230 kV line. Provide any updates to information available about the provincial assessment requirements.	The transmission line would follow generally existing rights of ways for Highway 655 and the 500 kV transmission line that goes from the Porcupine substation to the site. Generally, it is expected that the right of way would not need to be expanded significantly (current preliminary estimation is approximately 50 m, pending additional stages of engineering). Ownership of this transmission line will rest with Transmission Infrastructure Partnerships 1 (TIP1), a joint venture business of Taykwa Tagamou Nation, with Canada Nickel involved as a customer once construction is complete and the line is operational. TIP1 will be responsible for either securing the lands to build the transmission line or negotiating the easements with current landowners. TIP1 will also be responsible for provincial Environmental Assessment requirements, design, construction, connection, and operation/maintenance. This component will be subject to the provincial Class Environmental Assessment (EA) for Minor Transmission Facilities under either the Class EA Screening process or the Full Class EA process (to be determined by the Ministry of Environment, Conservation and Parks). The provincial Class EA processes were developed to streamline frequently occurring projects with similar characteristics and predictable environmental effects with well-defined mitigation measures.
133	Need for information on the expected frequency of rail traffic as a result of the Project and a comparison to existing conditions along existing rail lines.	Early discussion with Ontario Northland Transportation Commission confirmed that rail transportation is a feasible option based on available information at this stage. Indeed, the rail transportation would likely involve between one and two transports per day in general. The detailed impact on the existing rail network will be assessed in the impact statement, if an impact assessment is required.
134	Need for further information on transport of ore concentrate from the Project site, including potential destinations, care and control, alternatives to transport by rail, and potential impacts of ore concentrate transport on rail traffic, and transportation costs.	The current estimation is that over the life of the project, 1.5Mt of high-grade nickel concentrate would be produced, as well as 7.0 Mt of normal-grade nickel concentrate, and 103.8 Mt of iron concentrate. At this time, there is no specific location identified or commercial agreement concluded for downstream processing. The concentrate is anticipated to be sold on the open market and transported to processing facilities under the control of a third party either in Canada or abroad. Potential destinations in Canada include the Sudbury region (nickel processing), southern Ontario (stainless steel industry), a port in eastern Canada for shipment abroad, or a new processing facility that could be built by a third party at some point before or after the beginning of the operation at the Crawford Nickel Project. Considering the yearly average production of above 2Mt of concentrate per year, transportation by truck is not considered a good alternative to rail transportation as the main transportation mode (greenhouse gas emissions, costs, traffic). However, these quantities can be managed by rail transportation (one or two shipment per day).
135	Request for information on “special management / hazardous materials” and how they will be stored and transported.	<p>Hazardous materials will be required at the Crawford Nickel Project, as for most industrial establishments. Chemical reagents will be used in ore processing and for wastewater treatment at the site. Petroleum hydrocarbon products will also be used. The list of potentially hazardous material stored and used on-site will include diesel, gasoline, sulfuric acid, propane, flocculant, coagulant, flotation chemicals and other products typical for a mine operating in Ontario. Most of the hazardous materials will be transported by rail, but a part might also be transported by road. These products will be stored according to supplier and safety guidance, in separated and as applicable, contained areas. Storage tanks will be equipped with level indicators, instrumentation, and alarms to ensure spills do not occur during normal operation.</p> <p>In addition, should an impact assessment be required, CNC will identify and document the management of potential accidents and malfunctions that are applicable to the project in the impact statement.</p>
136	Need for further information on potential effects on air navigation from tall (90 m) waste rock stockpiles, and mitigation measures, including associated regulatory requirements.	The nearest airport is approximately 30 km from the centroid of the Project site, and unlikely to have a potential effect on air navigation due to the waste rock stockpiles. However, this will be further reviewed during Project permitting by federal agencies, and required mitigation measures will be implemented as an outcome of review.
137	Need legal descriptions of the land that will be used for all project components including the mine site and any linear features such as the highway, transmission lines, and rail spur.	Land Tenure information has been included in Appendix E of the Detailed Project Description.
138	Need to provide any updates to available information about the provincial assessment requirements for the highway relocation, 500 kV transmission line relocation, and new 230 kV transmission line, including who will do what and when. Provide information about actions the Proponent can take to support cooperation between jurisdictions.	Information about the provincial process has been provided in the DPD (see Section C.3.2). CNC is in the process of initiating discussions with the provincial authorities who will be involved in the permitting and assessment of the Crawford Project. CNC will, to the limit of its capacity and responsibility, promote cooperation between the jurisdiction by proactively communicating progress and planning, and participating in meetings involving both jurisdictions.
139	Request for information on any proposed collaboration with other projects/industries in the area with regard to infrastructure usage.	There are currently no agreements or collaborative efforts being undertaken with other projects in the area. Where necessary, CNC will engage with regulatory agencies on strategic initiatives.
<b>Public and Stakeholder Engagement</b>		
140	Need for Proponent to provide public notices of Project activities and documentation to additional surrounding communities in order to determine their interest in the Project.	Canada Nickel has engaged with surrounding communities on Project activities, with surrounding communities being defined by CNC as those interested communities located, by linear distance, within an approximately 50 kilometre radius from the Project centroid and being potentially impacted by the development of the Project. To date, this definition has encompassed the town of Cochrane, the town of Iroquois Falls, the town of Smooth Rock Falls, and the City of Timmins.

ID	COMMENT	RESPONSE
141	Request to engage the township of Black River - Matheson.	Canada Nickel has shared introductory correspondence with the township of Black River – Matheson with the offer to share project information.
<b>Social and Economic Conditions</b>		
142	Potential positive economic effects through employment and tax revenues.	Further information about the potential positive economic effects (employment and business) will be identified through engagement and research activities as well as Project planning. As appropriate this information will be used to support the effects assessment in the Impact Statement, if an Impact Assessment is required.
143	Need for further information on projected baseline economic conditions in the region, and any incremental effects from the Project. Include projections of baseline labour availability.	Further information will become available through engagement and research activities to inform baseline economic conditions. This information will be provided in the Impact Statement, if an Impact Assessment is required.
144	Need for sensitivity analyses on important economic variables including nickel market conditions to better understand Project feasibility and the likelihood that it will be implemented as described.	Further economic analysis including sensitivity analyses on economic variables for the Project will occur during ongoing engineering studies. The results from the engineering studies will be used to undertake further economic modelling and will be presented in the Impact Statement, if an Impact Assessment is required.
145	Concerns about labour shortages and the potential to need temporary foreign workers. To help inform tailored assessment requirements, (optionally) provide, in the Detailed Project Description, alternative means under consideration (if any) for acquiring and accommodating a sufficient workforce. This would inform the social effects assessment.	<p>Population projections suggest a decline in population in the Cochrane district, however federal immigration programs such as the Rural and Northern Immigration Pilot, are likely to result in an increase in available local workforce through direct and indirect effects pathways. As such, the Project may provide employment opportunities for the increasingly available local workforce in the region (See DPD Section D.8). Canada Nickel is engaging with regional training and education institutions to plan for the projected project workforce, and with the appropriate municipal and social bodies to discuss potential accommodation challenges.</p> <p>Further information and analysis on the required labour for the Project will occur during ongoing engineering studies, and information about economic opportunities (employment and business) will be identified through engagement and research activities as well as Project planning. As appropriate, this information will be used to support the assessment of labour which will be presented in the Impact Statement, if an Impact Assessment is required.</p>
146	Need for further information on employment related to the Project, including: <ul style="list-style-type: none"> <li>· information on how workers will be hired locally, from within Canada, or internationally;</li> <li>· the number of and types of jobs the Project will create (direct, induced) in different project phases;</li> <li>· estimated salaries and compensation for those jobs with comparison to other provincial and local employers;</li> <li>· whether assistance would be provided during any temporary lay-offs;</li> <li>· local employment barriers and availability of childcare for workers; and</li> <li>· any training and skills development programs to develop local job candidates.</li> </ul>	Further information and analysis on the required labour for the Project will occur during ongoing engineering studies. The results from the engineering studies will be used to support the assessment of labour which will be presented in the Impact Statement, if an Impact Assessment is required.
147	Need for further information on tax revenues generated by carrying out the Project during all Project phases.	Economic analysis to determine tax revenues generated by the Project will occur during ongoing engineering studies. The results from the engineering studies will be used to undertake further economic modelling and will be presented in the Impact Statement, if an Impact Assessment is required. Additional economic impacts, direct or indirect, related to tax revenues and/or anticipated (or projected) financial impacts on the region will also be further identified.
148	Need for information on the Project's costs, and if they would include procurement from local sources.	Further information on the Project costs will be determined in engineering studies that are currently underway. Relevant information will be considered for assessment and presentation in the Impact Statement, if an Impact Assessment is required.
149	Need for details on any commitments to maximize positive socio-economic outcomes for local communities.	<p>In consultation with a Local Procurement and Community Contributions Committee, comprised on social, economic, and municipal community representatives, CNC has implemented a Local Procurement Policy and a Contributions Program.</p> <p>The Local Procurement Policy states that, during the exploration phase of the Crawford Project, CNC will, to the maximum extent possible while ensuring safety, quality, and economy, give preference to goods and services provided by local companies after initial preference to Indigenous owned and operated businesses, or business with Indigenous joint ventures or partnerships. This policy will be amended and adapted to the construction and operation phases of the project as appropriate.</p> <p>The Contributions Guidelines aim at addressing social, educational, environmental, and health/wellbeing challenges, with particular emphasis on vulnerable populations, in both the short and long term. Long term, or Legacy, contributions will be favoured towards those challenges that may be triggered or amplified by development of the Crawford Project. Indigenous Nations have a distinct process for contributions, which is facilitated through direct communication between CNC and the community.</p> <p>Further details on commitments toward socio-economic outcomes for local communities will be included in the assessment of socio-economic effects and presented in the Impact Statement, if an Impact Assessment is required.</p>
150	Comments about potential for positive impacts on diversity and inclusion of underrepresented groups in the labour force.	Comment acknowledged. CNC is committed to fostering an inclusive, accessible environment for all employees, and will work to reduce barriers to employment for underrepresented groups in the labour force at the Crawford Project. CNC is also committed to the application of GBA+ throughout ongoing socio-economic baseline assessments and, as such, is committed to identifying barriers perceived by equity-deserving groups for greater participation and inclusion.

ID	COMMENT	RESPONSE
151	Potential social impacts of an influx of workers to the area on housing access and affordability, community safety, childcare access, health care access, social services and infrastructure, especially pertaining to vulnerable populations. Need for prevention and mitigation measures. Suggestion to engage early with service providers on the need to increase capacity.	It is anticipated that the project workforce will largely be drawn from the existing populations of local communities. Baseline socio-economic conditions for communities in the area of the Project and an assessment of potential effects will be provided in the Impact Statement, if an Impact Assessment is required. As a result of the assessment, mitigation and management measures will be developed for implementation during the construction, operation, and closure of the Project.
152	Potential for adverse social effects from the use of temporary foreign workers, if necessary, particularly on vulnerable populations.	CNC does not anticipate it would be necessary to engage temporary foreign workers for any stage of the project. Baseline socio-economic conditions for labour force in the area of the Project and an assessment of potential effects will be provided in the Impact Statement, if an Impact Assessment is required.
153	Comments on need to include the Township of Black River-Matheson in the benefits of the Project, including on committees organized by the Proponent, future strategic partnerships, procurement and development, employment, training and education, and other opportunities.	<p>The Township of Black River-Matheson has been invited to participate in future project engagement activities.</p> <p>CNC's Local Procurement Policy states that, during the exploration phase of the Crawford Project, CNC will, to the maximum extent possible while ensuring safety, quality, and economy, give preference to goods and services provided by local companies after initial preference to Indigenous owned and operated businesses, or business with Indigenous joint ventures or partnerships. This policy will be amended and adapted to the construction and operation phases of the project as appropriate. Local is divided into Tier 1 and Tier 2, where Tier 2 encompasses the entire Cochrane District.</p> <p>It is anticipated that the project workforce will largely be drawn from the existing populations of the region, given CNC's objective to employ locally where possible. CNC has and will continue to engage with local training institutions to emphasize regional education and employment.</p> <p>CNC has developed its committees, benefits programs, and engagement activities to focus on those communities surrounding the Crawford Project, with surrounding communities being defined by CNC as those interested communities located, by linear distance, within an approximately 50 kilometre radius from the Project centroid and being potential impacted by the development of the Project.</p>
154	Need for further information on any potential impacts to the existing economic activity and business in the region (such as tourism), beyond the Project footprint, including mitigation for negative impacts. To help tailor assessment requirements, (optionally) provide, in the Detailed Project Description, readily available information about tourism operator locations in an approximate zone of effect around the Project footprint, such as commercial Bear Management Areas.	<p>CNC has engaged with the local tourism industry, including meetings with the owners of the relevant Bear Management Area and discussions with Nature and Outdoor Tourism Ontario. CNC issued a letter through a NOTO newsletter to its members requesting that any tourism operations operating in proximity to the Crawford Project contact CNC. A similar request to all land users was issued in the CNC October 2022 newsletter. No responses were received from either of these outreaches.</p> <p>Baseline information on existing economic activity and business in the region and an assessment of potential effects on tourism will be identified through primary research and engagement with municipalities and Indigenous Nations, specifically tourist operators during preparation of the Impact Statement, if an Impact Assessment is required. This will correspond to the project's approximate zone of effect, such as the project study area, local study and regional study area.</p>
155	Concern about the recreational experience for campers and seasonal businesses such as Bigwater Campground. Need to provide information about the extent of noise, vibrations, air quality and water quality changes at Bigwater Campground (if any) and any similar receptors identified. Encouraged to engage the business owner(s) and interested seasonal campers on the analysis.	An assessment of potential effects on the recreational experience for campers and seasonal businesses will be provided in the Impact Statement, if an Impact Assessment is required. The assessment will be supported by baseline information and further engagement with stakeholders. Canada Nickel has reached out to the business owners. Considering the distance from the Project site to the Bigwater Campground, effects from the project are not anticipated, however these will be assessed in the Impact Statement, if an Impact Assessment is required.
<b>Sustainability</b>		
156	Comment about the Project's contributions to sustainability, including whether the ore concentrate would be further processed in Canada, and products manufactured in Canada, and if not, whether global transportation costs might counter the benefits.	At this time, there is no specific location identified or commercial agreement concluded for downstream processing of ore concentrate. The concentrate is anticipated to be sold on the open market and transported to processing facilities either in Canada or abroad. Potential destinations in Canada include the Sudbury region (nickel processing), southern Ontario (stainless steel industry), a port in eastern Canada for shipment abroad, or a new processing facility that could be built by a third party at some point before or after the beginning of the operation at the Crawford Nickel Project. Considering the yearly average production of above 2Mt of concentrate per year, transportation by rail and potentially cargo ship are viable options.
<b>Vulnerable Population Groups (Gender-Based Analysis Plus)</b>		
157	Need for further information on data collection methodology and potential impacts on the health and safety of women, children, Elders and other vulnerable groups, taking into account how they may be affected differently.	Through engagement and primary research, additional baseline information and an assessment of potential effects on the health and safety of vulnerable population groups will be provided in the Impact Statement, if an Impact Assessment is required. As part of CNC's efforts to ensure under-served communities are adequately identified, those deemed as vulnerable population groups will be considered via an intersectional approach to primary research throughout both engagement and research processes. For Indigenous Nations, direct community information is anticipated to be provided through the TK/LU studies and possibly socio-economic studies and as such, will be shared in the Impact Statement should an Impact Assessment be required.
158	Comment to ensure that women, youth, Elders, and 2SLGBTQQIA+ people will be included in engagement.	The Detailed Project Description has been updated in Section B.1.4 to include women, youth, Elders, and 2SLGBTQQIA+ people.
159	Need for further information on labour market conditions for underrepresented populations and more information on how the mine could improve their labour market outcomes.	CNC is committed to fostering an inclusive, accessible environment for all employees, and will work to reduce barriers to employment for underrepresented groups in the labour force at the Crawford Project. Further information on labour market conditions will be included in the Impact Statement, if an Impact Assessment is required.



ID	COMMENT	RESPONSE
160	Need for further information on how employment access barriers, disparities in the labour force, and income disparities for women will be addressed. Concerns about sexual harassment of female employees.	CNC has a Respect in the Workplace –Workplace Harassment, Sexual Harassment and Discrimination Policy and a Workplace Violence policy, which address CNC’s commitment providing a work environment that is free from discrimination, harassment and reprisals, and supportive of the productivity, dignity, and self-esteem of every employee. This includes prohibition of workplace sexual harassment and the steps for reporting such incidents. CNC is engaging with local and Indigenous training and labour institutions to understand employment access barriers in the region and the steps that can be taken to remove such barriers at the Crawford Project. Further information on labour market conditions will be included in the Impact Statement, if an Impact Assessment is required.
161	Comment that youth need access to jobs, training and formal long-term education.	CNC is engaging with local and Indigenous training and labour institutions to understand education and employment access barriers for youth in the region and the steps that can be taken to remove such barriers at the Crawford Project. CNC has worked with the Far Northeast Training Board to engage with high school students and explain potential education and career paths in the mining industry.  Employment and Training opportunities will be addressed in the agreements determined appropriate by each Indigenous Nation, including but not limited to Impacts and Benefits Agreements.  Further information on labour market conditions will be included in the Impact Statement, if an Impact Assessment is required.
<b>Water</b>		
162	Potential effects of seepage and runoff from ore, mine rock, tailings, and overburden on ground water quality and surface water quality.	The potential effects on ground water and surface water quality from Project site infrastructure will be assessed in the Impact Statement, if an Impact Assessment is required. Seepage will be collected in drainage ditches surrounding the mining infrastructures. The clay cover naturally present in the area offers a very effective barrier to prevent migration of contaminants to the subsurface. In addition, the preliminary geochemistry results suggest that metal leaching will be low. Finally, monitoring programs will be implemented to ensure that regulatory requirements for water quality are met.
163	Need to predict acid rock drainage and metal-leaching potential. Need for geochemical studies and drainage predictions from tailings, waste rock, ore, low-grade ore, overburden, and aggregate. Need tailings and waste rock management plans.	Geochemistry studies are currently underway, and the results will be considered during the engineering design for the mine waste facilities. The results of the geochemistry studies will be presented in the Impact Statement, if an Impact Assessment is required. Early results from the static and kinetic test work completed to date are favourable, suggesting that acid generation and metal leaching will not be a significant concern. A more comprehensive program, including static and kinetic testing on approximately 300 samples, is ongoing to confirm the initial results on the waste rock and to collect data on tailings, overburden, and low-grade ore.
164	Need for baseline information on groundwater, including upgradient and downgradient groundwater quality, groundwater levels, hydraulic conductivities, flow directions and velocities in both the bedrock and overburden, for the entire site and at individual mine facilities, to predict where contaminants might surface in water courses. Need ongoing monitoring during operations.	Baseline groundwater investigations are currently ongoing and will support the hydrogeological modelling for the Project. The baseline information, hydrogeological modelling and the assessment of potential effects on groundwater will be provided in the Impact Statement, if an Impact Assessment is required. The results of the assessment will be used to develop monitoring programs during the operation and closure phases.
165	Need a receiving environment water quality model to help identify mitigation needs.	An assessment of the change in water quality at the receiving environment will be modelled and provided in the Impact Statement, if an Impact Assessment is required. The results of the assessment will be used to develop applicable mitigation during the construction, operation and closure phases. As part of the Provincial permitting process, receiver-based effluent discharge criteria will be developed and take into consideration environmental conditions, receiving waters capacity, predicted water quality parameters and regulatory requirements.
166	Need for more information on water management facilities and drainage works for all phases of the Project, including how and where seepage and mine contact water will be collected, monitored, and treated as necessary.	Further information has been included in the Detailed Project Description and a comprehensive description of the water management facilities, drainage works and treatment areas will be included in the Impact Statement, if an Impact Assessment is required.
167	Request for additional information about how tailings storage facilities will be isolated from surface and groundwater sources, on land and in open pits, during operations and after closure.	The tailings management facility (TMF) will be designed in accordance with the Canadian Dam Association Dam Safety Guidelines and regulatory guidelines. The TMSF will be located a safe distance from nearby waterbodies. The clay cover naturally present in the TMF area also offers a very effective barrier to prevent migration of contaminants to the subsurface. In addition, the preliminary geochemistry results suggest that metal leaching will be low. Further information on the TMF will be included in the Impact Statement, if an Impact Assessment is required.
168	Concern with the proximity of tailings to waterbodies and potential contamination from any tailings seepage (e.g. mercury, cyanide).	The TMF will be located a safe distance from nearby waterbodies. Seepage collection ditches will be constructed at the perimeter of the TSF to collect the seepage water and pump it back to the TSF or recycle pond. In addition, the preliminary geochemistry results suggest that metal leaching will be low. Further information on the TMF and an assessment of potential effects to surface and ground water will be presented in the Impact Statement, if an Impact Assessment is required. The results of the assessment will be used to develop applicable mitigation during the construction, operation and closure phases.
169	Need for additional information about ore stockpile design, including measures to prevent environmental contamination from drainage and runoff, such as a liner.	Preliminary geochemical analyses and water quality modelling indicate that mine rock and the low-grade ore stockpiles will not be acid generating and metal leaching will be low. In addition, there is a natural clay cover that will help prevent the migration of contaminants to the groundwater, if any. As such, a liner is not expected to be required at this stage. Collection ditches will be constructed along the outer limits of the stockpiles to capture sediment-laden runoff water and route surface water flows to a network of sumps. Surface runoff from stockpiles will be pumped to collection ponds for reuse in the process facility or treatment prior to discharge. An assessment of potential effects to surface and ground water will be presented in the Impact Statement, if an Impact Assessment is required. The results of the assessment will be used to develop applicable mitigation during the construction, operation and closure phases.

ID	COMMENT	RESPONSE
170	Need for a site-wide stormwater control study.	Mine water from the dewatering of the open pit will be pumped to a collection pond for additional management, including for re-use as make up water for the process plant. Precipitation and surface runoff that come into contact with mine-related facilities will be collected in ditches will be pumped to the collection pond. The collection pond will be designed with sufficient capacity to support the retention and treatment of contact water, including an appropriate influx of stormwater, and to provide water for processing operations. Further information on the integrated water management system will be included in the Impact Statement, if an Impact Assessment is required.
171	Concern about water storage capacity in the water storage ponds and whether it will be necessary to discharge untreated contact water to the environment at any point.	Project structures which are intended to hold water will be designed to meet appropriate environmental storm/inflow events, including the effect of climate change. The design criteria of water management features such as ditches, pond and water treatment systems will be compliant to the Canadian Dam Association standards. As is standard design practice, only in rare circumstances of extreme storm events may controlled discharge of untreated contact water occur.
172	Need to develop receiver-based effluent discharge criteria, taking into account the physical, chemical, and biological conditions of the receiving waterbody, the receiver's assimilative capacity, mixing zone requirements, the identification of contaminants of concern, and potential impacts to other water uses.	As part of the Provincial permitting process, receiver-based effluent discharge criteria will be developed and take into consideration environmental conditions, receiving waters capacity, predicted water quality parameters and regulatory requirements.
173	Comment with request for the most conservative water quality criterion to be applied for the protection of aquatic life at the point of effluent discharge, with no mixing zone.	Receiver-based effluent discharge criteria will be developed during the Provincial permitting process, and used to determine the applicable mixing zone for the treated effluent location associated with the Project.
174	Need to incorporate Indigenous knowledge into selection of the effluent discharge location.	Effluent from the mine will meet all regulatory requirements prior to discharge, including the Metal and Diamond Mining Effluent Regulations (MDMER). The selection of the preferred location for treated effluent will include consideration of relevant information from Indigenous Knowledge studies provided by local Indigenous Nations. An assessment of alternatives will be provided in the Impact Statement, if an Impact Assessment is required.
175	Need additional information on source of water supply at seasonal-use properties near the proposed tailings management facility, and potential water quality effects.	A seasonal-use property near the proposed TMF receives water supply from a nearby well situated close to the lake. Further information on the TMF and an assessment of potential effects to surface and ground water will be conducted using applicable modelling and presented in the Impact Statement, if an Impact Assessment is required. The results of the assessment will be used to develop applicable mitigation during the construction, operation and closure phases.
176	Concerns raised about potential effects of effluent discharge in the Mattagami River.	Effluent discharge to the environment will meet all federal and provincial regulatory requirements. An assessment of the potential for changes in water quality due to effluent discharge will be provided in the Impact Statement, as appropriate, if an Impact Assessment is required.
177	Concerns about any changes to water levels and how they might affect fish, amphibians, emergent plants, and forests.	The potential effects of changes in water levels on aquatic and terrestrial resources due to the Project will be presented in the Impact Statement, as appropriate, if an Impact Assessment is required.
178	Comment about water used for dust control, and whether it would be sourced from the natural environment or recycled from site.	Water requirements for control of dust emissions from haul roads and construction areas will be recycled from the Project site.
179	Concerns about increased risk of mercury mobilization in selected source-water intake locations. Need to incorporate Indigenous knowledge when identifying potential water sources.	Water required for the Project will be obtained primarily by recycling site runoff and open pit mine water. If additional fresh water is required for process make up and a fire water supply, it may be sourced from a local watercourse. The withdrawal of water would be minimized to meet regulatory guidelines for the protection of the aquatic environment. An assessment of alternative locations for the water source will be provided in the Impact Statement, if an Impact Assessment is required, and include relevant information from Indigenous Knowledge studies provided by local Indigenous Nations in the selection of the location.
180	Concern about water-crossings being potential inputs of contamination.	Access and haul roads will be constructed with non-acid generating aggregate or mine rock, and the number and size of water crossings will be minimized. Mitigation measures will be implemented during construction and operation to reduce the risk of potential contamination from water crossings. A summary of the mitigation measures and an assessment of the potential for changes in water quality will be provided in the Impact Statement, as appropriate, if an Impact Assessment is required.
181	Need to provide information about planned sediment control and the potential residual effects of sedimentation downstream of Project activities.	The potential effects of sedimentation on water quality due to the Project will be managed with standard sediment control measures. A summary of the sediment control measures and an assessment of any potential residual effects on water quality in downstream systems will be presented in the Impact Statement, as appropriate, if an Impact Assessment is required.
182	Need for further information on how the release of nitrogen into the aquatic environment from the use of explosives will be minimized.	Effluent discharge to the environment will meet all federal and provincial regulatory requirements. Ongoing engineering is occurring to determine the extent and location of the use of explosives associated with the Project. Based on these studies, relevant information will be used to conduct an assessment of potential effects on surface water quality due to the use of explosives for the Project which will be presented in the Impact Statement, if an Impact Assessment is required. The results of the assessment will be used to develop applicable mitigation measures to minimize effects on surface water quality during the construction, operation and closure phases.
183	Concerns about whether there is any potential for changes to water quality at Bigwater Campground.	As the Bigwater Campground is located in a different watershed and far from the Crawford Nickel Project, there are no anticipated impacts or changes to water quality which may result from development of the Crawford Nickel Project.
184	Need to characterize temporal variability and trends in baseline surface water quality and quantity in areas that might be affected by the Project.	Environmental baseline studies are ongoing; characterization information will be included in the Impact Statement as appropriate, should an Impact Assessment be required.
<b>Wetlands</b>		
185	Potential direct and indirect effects on wetlands and wetland functions during all Project phases.	Impacts to wetlands will be assessed as appropriate in the Impact Statement, if an Impact Assessment is required.
186	Need for information on avoidance and mitigation measures for potential effects to wetlands and wetland functions. Need supporting information to show that mitigation for surface and groundwater effects, and accidents and malfunctions, will mitigate potential indirect effects on wetlands and wetland functions. Need for information on potential residual effects during all Project phases.	Wetlands that are potentially impacted by the Project directly or indirectly will be identified within and directly adjacent to the Project footprint. Measures to avoid and/or mitigate potential effects to wetlands, along with a description of the potential residual effects during all Project phases will be assessed as appropriate in the Impact Statement, if an Impact Assessment is required.