



Impact Assessment  
Agency of Canada  
Ontario Region  
600-55 York Street  
Toronto ON M5J 1R7

Agence d'évaluation  
d'impact du Canada  
Région de l'Ontario  
600-55, rue York  
Toronto (Ontario) M5J 1R7

December 19, 2024

Sent by email

Pierre-Philippe Dupont  
Vice President, Sustainability  
Canada Nickel Company  
Suite 1900, 130 King St. W  
Toronto ON M5X 1E3  
<email address removed>

**SUBJECT: Next Steps in the Impact Statement Phase for the  
Crawford Nickel Project**

Dear Pierre-Philippe Dupont:

I am writing to advise you of improvements to our processes in light of the recent amendments to the *Impact Assessment Act* (the IAA)<sup>1</sup> and the measures announced in *Building Canada's Clean Future* and the accompanying Cabinet Directive on Regulatory and Permitting Efficiency for Clean Growth Projects<sup>2</sup>. These measures will streamline the ongoing assessment and any permitting requirements of the Crawford Nickel Project (the Project).

The Impact Assessment Agency of Canada (IAAC), will:

- focus its technical review of the Impact Statement by placing emphasis on key issues relevant to decision-making, specifically federal effects and positive benefits as set out in the amended IAA;
- support early technical discussions on the key issues relevant for decision-making, as listed in the Enclosure, to ensure that the assessment process is as efficient and effective as possible, and in consideration of the amended IAA;
- leverage provincial legislative frameworks and tools to address key federal issues; and,

.../2

---

<sup>1</sup> Amended *Impact Assessment Act*: <https://laws.justice.gc.ca/eng/acts/I-2.75/index.html>

<sup>2</sup> Cabinet Directive: <https://www.canada.ca/en/privy-council/services/clean-growth-getting-major-projects-done/cabinet-directive.html>

- support and coordinate future permitting requirements for the Project.

#### Maximizing collaboration

As set out in the Cooperation Plan<sup>3</sup>, aspects of the Project are also subject to class environmental assessments pursuant to Ontario's *Environmental Assessment Act*, and various provincial permitting and approvals that include an assessment of environmental effects. IAAC wants to explore opportunities with you to maximize collaboration with the Province of Ontario and to take full advantage of other means to address effects in federal jurisdiction, to enhance regulatory efficiency and support the principle of "one project, one assessment".

#### Key issues relevant for decision-making

We thank you for your recent submission of the Impact Statement for the Project. We acknowledge the time, resources and effort you have committed to achieve this important milestone.

IAAC will ensure that the process going forward will be effective, efficient and cooperative. IAAC will conduct a technical review of the Impact Statement taking into consideration the requirements of the Tailored Impact Statement Guidelines<sup>4</sup> as well as the amended IAA. To ensure that the technical review and consultation on the Impact Statement is as efficient as possible, IAAC is providing a list of key issues (Enclosure 1) so that specific focus and attention is given to the issues that IAAC views as being material to decision-making under the amended IAA. IAAC further offers to hold technical meetings with federal and provincial experts so that technical matters can be discussed in a timely manner, allowing for the efficient review of the final Impact Statement.

When IAAC is satisfied that you have provided it with all the required information and studies, IAAC will post a notice of that determination on the Canadian Impact Assessment Registry in accordance with subsection 19(4) of the IAA.

.../3

---

<sup>3</sup> Cooperation Plan: <https://iaac-aeic.gc.ca/050/evaluations/document/147338>

<sup>4</sup> Tailored Guidelines: <https://iaac-aeic.gc.ca/050/documents/p83857/147104E.pdf>

Coordinating permitting

To further increase efficiency and timeliness, as indicated in correspondence to you on September 23, 2024, we encourage you to consider working concurrently on complementary federal regulatory processes that may be required for the Project. IAAC is available to liaise with federal authorities to support the coordination of these processes.

Additional information can be found on IAAC's website at:

<https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/coordination-federal-authorizations-impact-assessment-process.html>.

If you have any questions, please do not hesitate to contact me by phone at 226-750-8853 or by email at Crawford@iaac-aeic.gc.ca.

Sincerely,

<original signed by>

Grant Jensen  
Project Manager, Ontario Region

Enclosure – Crawford Nickel Project - Key issues relevant to decision-making under the *Impact Assessment Act*

c.c.: Sydney Oakes, Canada Nickel Company  
Mathieu Boucher, Canada Nickel Company  
Chris Powell, Stantec

**Enclosure 1 – Crawford Nickel Project - Key issues relevant to decision-making under the *Impact Assessment Act***

In order to ensure that the technical review and consultation on the Impact Statement is as efficient as possible, the Impact Assessment Agency of Canada (IAAC) is providing a list of key issues for the Crawford Nickel Project (the Project) so that specific focus and attention is given to the issues that it views as being material to decision-making under the amended *Impact Assessment Act* (IAA).

With respect to **fish and fish habitat**, given the context of the Project as set out in the Tailored Impact Statement Guidelines, IAAC's review will focus specific attention on:

- adverse changes to fish habitat through overprinting, diversions, and flow reductions in the North Driftwood River watershed (in particular), as well as the West Buskegau River and Jocko Creek watersheds;
- the development of feasible offsetting plans that take into account groundwater drawdown, to inform more detailed federal permitting;
- managing the downstream geographic extent of contaminants in the North Driftwood River, West Buskegau River, Jocko Creek and Abitibi River, as a result of planned or unplanned effluent discharge, taking into account any acid rock drainage or metal(loid) leaching, with consideration of how provincial permitting and the mine closure plan can address effects;
- ensuring no unplanned effluent to the Mattagami River;
- ensuring the site water management plan is adequately designed for future climate scenarios such that mitigation remains effective;
- fish species of importance to Indigenous Peoples such as country foods, or for traditional or medicinal purposes, such as walleye, white sucker and northern pike;
- fish species of special concern (lake sturgeon) and their continued local recovery.

With respect to **migratory birds**, given the context of the Project as set out in the Tailored Impact Statement Guidelines, IAAC's review will focus specific attention on:

- adverse changes on migratory bird species of importance to Indigenous Peoples and their respective habitats, such as sandhill crane, ducks and geese.
- Migratory bird species at risk and their respective habitats (notably: bank swallow, barn swallow, Canada warbler, eastern whip-poor-

will, bobolink, eastern meadowlark, common nighthawk, evening grosbeak, olive-sided flycatcher and yellow rail) to identify any non-standard mitigation needs and taking into account provincial legislative frameworks that can address effects.

With respect to the potential **impacts on Indigenous Peoples**, the requirements set out in the Tailored Impact Statement Guidelines specific to current use of lands and resources for traditional purposes, physical and cultural heritage of Indigenous Peoples, as well as health, social and economic conditions require assessment by the Proponent in collaboration with the Indigenous communities identified in the Indigenous Engagement and Partnership Plan<sup>5</sup> for the Project. IAAC will look closely at the downstream extent of any water quality changes in the Abitibi River to determine if the list of communities should be updated. IAAC will continue to meaningfully engage and consult with Indigenous Peoples throughout the assessment process, specifically on the potential adverse impacts of the Project on Aboriginal and/or Treaty rights as recognized and affirmed in section 35 of the *Constitution Act, 1982*.

Finally, in the event there are significant adverse effects within federal jurisdiction on the matters listed above, IAAC will also consider the **positive contributions of the Project**. This can include information made available in the Impact Statement to substantiate any predictions about:

- improvements to local and regional socio-economic conditions, such as: employment, business, and training opportunities for members of potentially affected Indigenous communities and diverse subpopulations of the local community; contributions to local health and social programs; and initiatives to address wage inequality for Indigenous Peoples;
- contributions to the domestic production of critical minerals in alignment with the Canadian Critical Minerals Strategy; and
- the extent to which carbon storage in tailings will contribute to Canada's climate change commitments.

---

<sup>5</sup> <https://iaac-aeic.gc.ca/050/evaluations/document/147339>