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Subject: Natural Resources Canada's Submission for the Crawford Nickel Project – Request for comments on the Draft IA report and potential conditions

On May 12, 2026, the Impact Assessment Agency of Canada (the Agency) requested Natural Resources Canada (NRCan) to provide comments on the Draft Impact Assessment (IA) Report and potential conditions for the Crawford Nickel Project (the Project).

NRCan is participating in the impact assessment process pursuant to Section 23 of the *Impact Assessment Act,* 2019, as a department in possession of specialist or expert information or knowledge related to the project. As requested by the Agency, NRCan reviewed areas related to fish and fish habitat (with expertise related to groundwater quantity, mine waste geochemistry, and source term predictions), climate change (carbon capture), and economic benefits of the project. NRCan is of the view that the report adequately characterizes the potential adverse effects within NRCan's mandate and accurately summarizes its comments and views, with minor suggestions included in the table below.

For additional information, please contact Colter Kelly (colter.kelly@nrcan-rncan.gc.ca) or Christina Clarke (christina.clarke@nrcan-rncan.gc.ca)

Sincerely,
Colter Kelly
Senior Impact Assessment Officer, Impact Assessment Division
Natural Resources Canada

CC: Christina Clarke, A/ Director, Impact Assessment Division

Table 1: NRCan comments on the Draft Impact Assessment Report and Potential Conditions.

Section	Reference text	Concern	Suggestion
Mine waste and site water management	The proponent has committed to take these steps including ongoing testing throughout the construction and operations phases to ensure ARD prone materials are appropriately segregated or blended before use in construction or as cover.	ML prone materials should also be appropriately mitigated.	NRCan recommends that the text be revised to: The proponent has committed to take these steps including ongoing testing throughout the construction and operations phases to ensure **ML/ARD** prone materials are appropriately **mitigated (e.g., segregated or blended)** before use in construction or as cover.
Mine waste and site water management	Initial geochemical characterizations indicate that waste rock, ore, overburden, and tailings are generally non-acid-generating with low metal-leaching potential, and so waste segregation is not anticipated to be required. Nevertheless, the mine-waste management plan would use confirmatory testing to identify materials with ML/ARD-potential. The project would use thickened tailings (i.e., high-density slurry dewatered to a consistency that allows for conical stacking to improve stability) that would be ultimately stored in the tailings management facility until it is full and then in	Editorial	NRCan recommends moving the reference text further down as mitigation comes after ML/ARD (i.e., source term) characterisation.

	the open pit as each zone is exhausted. In both cases, the tailings would eventually be covered to reduce the potential for ML/ARD including vegetation cover over the tailings management facility and water in the open pit.		
Condition 3.4.1	3.4.1 monitor concentrations of contaminants of potential concern, including chromium VI, cobalt, copper, nitrate-N, nitrite-N, selenium, uranium, vanadium and zinc at the seepage face in the North Driftwood River (including headwater lakes), West Buskegau River, and Jocko Creek.	Add pH as it can be an early indicator of potential contaminants.	NRCan suggests adding pH to the monitoring requirements in the condition: Monitor **pH and** concentrations of contaminants of potential concern, including chromium VI, cobalt, copper, nitrate-N, nitrite-N, selenium, uranium, vanadium and zinc at the seepage face in the North Driftwood River (including headwater lakes), West Buskegau River, and Jocko Creek.