

Table 1: Public Health Agency of Canada’s comments on the Draft Impact Assessment Report for the Crawford Nickel Project

Comment ID	Report Section	Context and Rationale	Public Health Agency of Canada Recommendation
PHAC-IA-01	4.2.3, Table 9: Summary of IAAC’s recommended mitigation measures and follow-up program measures pertaining to changes to the health, social and economic conditions of Indigenous Peoples p. 84	In Table 9, IAAC recommends that the Proponent “develop mandatory cross-cultural awareness training in consultation with Indigenous communities, to be provided to employees and contractors associated with the project, and document their participation in the training.” While <i>awareness</i> training provides an important introductory understanding of Indigenous histories and cultures, it may not sufficiently prepare the workforce to engage respectfully and effectively with diverse communities or to mitigate potential negative social impacts on Indigenous Peoples.	PHAC recommends that this measure be strengthened in alignment with current best practices by requiring cultural competency training, rather than cultural awareness training. Cultural competency training goes beyond introductory awareness by building the practical knowledge, skills, and behaviours needed for employees and contractors to work safely, respectfully, and effectively with Indigenous peoples and other diverse cultural groups, thereby better supporting positive community relations and reducing potential social impacts.

Table 2: Public Health Agency of Canada’s comments on the Draft Potential Conditions for the Crawford Nickel Project

Comment ID	Draft Condition Section	Context and Rationale	Public Health Agency of Canada Recommendation
PHAC-01	Section 5 Health, social, and economic conditions of Indigenous Peoples, Subsection 5.1.4	The Potential Condition requires the Proponent to “ develop mandatory cross-cultural awareness training in consultation with Indigenous groups, provide the training to employees of the Designated Project and contractors associated with the Designated Project and document the participation of employees of the Designated Project and contractors associated with the Designated Project in the training.” While <i>awareness</i> training provides an important introductory understanding of Indigenous histories and cultures, it may not sufficiently prepare the workforce to engage respectfully and effectively with diverse communities or to mitigate potential negative social impacts.	PHAC recommends that the condition be revised in alignment with current best practices to require cultural competency training, rather than cultural awareness training. Cultural competency training goes beyond introductory awareness by building the practical knowledge, skills, and behaviours needed for employees and contractors to work safely, respectfully, and effectively with Indigenous peoples and other diverse cultural groups, thereby better supporting positive community relations and reducing potential social impacts.