File: ENVA-30020-04/MM 26

Reference: 423629

October 30, 2026

SENT VIA EMAIL

Terence Hubbard
President, Impact Assessment Agency of Canada
22nd floor, Place Bell,160 Elgin Street
Ottawa ON K1A 0H3
Terence.Hubbard@iaac-aeic.gc.ca

Dear Terence Hubbard:

I am writing to request substitution pursuant to the *Impact Assessment Act* (IAA) and in accordance with the Impact Assessment Cooperation Agreement Between Canada and British Columbia (B.C.) (Cooperation Agreement) for the proposed North Island Mine Project (the Project).

On October 21, 2026, the Environmental Assessment Office (EAO) received the Initial Project Description for the Project. North Island Mining Corp (NIMC) proposes to construct, operate and decommission a copper-gold mining project that would mine 26 million tonnes of ore per year over a 37-year mine life. The Project is located approximately 25 km west of Port Hardy, B.C. The Project meets the thresholds for a reviewable project requiring an environmental assessment under the *Environmental Assessment Act* (2018) (EA Act), as its proposed production capacity exceeds the thresholds in the *Reviewable Projects Regulation* respecting the construction of a new mine facility.

I understand that the Impact Assessment Agency of Canada (IAAC) also received an Initial Project Description for the Project on October 21, 2026, and that the Project is expected to meet the definition of a designated project under the IAA's *Physical Activities Regulations* as its proposed production capacity exceeds the threshold for

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the construction and operation of a new mine that will have an ore production capacity of 5,000 tonnes per day or more.

Request for Substitution

I am aware that the EAO and IAAC project teams have been working closely on a joint process for the EAO's Early Engagement and IAAC's Planning phase, and that they intend to jointly begin engagement with First Nations and the public shortly.

In accordance with the Cooperation Agreement, I am submitting this request for substitution to allow IAAC to consult the public and First Nations on the substitution request as part of the planned comment period. I understand that, later in the planning phase, IAAC will decide whether an impact assessment is required for the Project and, following that, the federal Minister of Environment, Climate Change and Nature (the Minister) will respond to this request for substitution.

As per the Cooperation Agreement and the March 2025 Commitment Statement - British Columbia - Canada Coordination on Permitting for Critical Mineral Projects, the EAO has been working closely with IAAC to enable coordinated engagement, facilitate a common process and issue joint documents where possible. The EAO is committed to this cooperative approach throughout the review of the Project.

If substitution is approved by the Minister, the EAO commits to meet the legislative requirements of both Canada and B.C. and fulfil the conditions for substitution under the IAA set out in section 7 of the Cooperation Agreement and any conditions the Minister may establish. The EAO will take into account the factors set out under subsection 22(1) of the IAA and fully assess the effects to areas of federal jurisdiction as defined in section 2 of the IAA, when conducting the assessment and providing an Assessment Report with findings and conclusions to the Minister. The EAO will work with IAAC to consider any amendments to the IAA and any potential implications on the conduct of a substituted process.

During the assessment, the EAO would seek, manage, and rely on the advice of members of the Technical Advisory Committee, including representatives from federal authorities, in establishing information requirements for the assessment, assessing the potential effects of the Project and assessing the adequacy of any proposed mitigation measures.

Conclusion and Next Steps

In accordance with the provisions of the IAA and the Cooperation Agreement, B.C. requests that the Minister approve the substitution of B.C.'s assessment process for the Project, should a federal impact assessment be required under the IAA.

Additionally, if the Minister approves the substitution request, consultation with First Nations, federal authorities, and engagement with the public will be carried out by the EAO in accordance with the Cooperation Agreement and the EA Act. The EAO will work with IAAC to coordinate engagement with Indigenous peoples. The EAO will

also work with IAAC on the preparation of a permitting plan, including federal requirements, for the Project.

I look forward to hearing from you as soon as possible regarding the Minister's decision on this request for substitution.

Sincerely,
<original signed by>

Meaghan Hoyle
Acting Chief Executive Assessment Officer and Associate Deputy Minister

cc: Tracy James, A/Assistant Deputy Minister
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