



Métis Nation of Ontario
Lands, Resources and Consultations

2 February, 2023

Impact Assessment Agency of Canada
Crawford Nickel Project Team
55 York Street, 6th Floor
Toronto, ON
M6J 1R7

VIA ELECTRONIC MAIL

RE: Enclosure 1: Summary of information on potential impacts of the Crawford Nickel Project on the Métis Nation of Ontario

The Métis Nation of Ontario “MNO” would like to inform the Impact Assessment Agency of Canada “IAAC” that we have additions to the “Enclosure 1: Summary of information on potential impacts of the Crawford Nickel Project on the Métis Nation of Ontario”. This updated version will ensure consultation will proceed in a respectful and meaningful way as it relates to the Crawford Nickel Project “The Project”. Canada Nickel Company “the Proponent” is proposing an open-pit nickel-cobalt mine and metal mill, located 43 kilometres north of Timmins, Ontario. Based on available information, the “project area” includes:

- *a large mine site footprint of > 5000 ha, including open pits, waste rock piles and a tailings management facility, predominantly within the North Driftwood River and West Buskegau River watersheds;*
- *relocation of Highway 655 and existing 500 kV transmission line to the west of the mine, including approximately 20 km of new right of way;*
- *effluent discharge pipe(s) to locations that may include the Mattagami River downstream of Lower Sturgeon Dam, the North Driftwood River, and the West Buskegau River;*
- *a new rail spur from the proposed mine south to Kidd Mine, following Highway 655; and*
- *transport of ore along an existing rail line between Kidd Mine and Kidd metallurgical site.” (IAAC, 2023)*

The Project area lies within the Métis Nation of Ontario’s James Bay/Abitibi/Temiscamingue Traditional Territory, represented by the Abitibi Inland Historic Métis Community (Region 3) Consultation Committee, as per the Consultation Agreement between the Métis Nation of Ontario and the Government of Canada. Citizens of the Métis Nation of Ontario have Aboriginal rights that are recognized and affirmed under section 35 of the Constitution Act, 1982. In addition, the Métis Nation of Ontario citizens have harvesting rights under the Framework Agreement on Métis Harvesting with the Province of Ontario. It is of no surprise that the Crawford Nickel Project will have potential impacts to the exercise of the Métis Nation of Ontario’s rights resulting from any

change to the environment due to the Project; and potential impacts of the Project on health, social, or economic conditions of the Métis Nation of Ontario. Below, we have provided a summary of additional impacts that are of concern to the Métis Nation of Ontario's Region 3 citizens.

Potential impacts to the current use of lands and resources for traditional purposes

1. Potential impacts to harvesting, fishing, the gathering of plants and mushrooms, and cultural practices due to relocation of Highway 655 and existing 500 kV transmission through waterbodies and habitat communities. Potential to disturb wildlife corridors, breeding grounds, overwintering site, and reduced access to places.
2. Potential impacts to harvesting as a result of the transport of ore and waste onsite and to the Kidd metallurgical site on existing rail line. There is potential or perceived potential to disturb wildlife, and breeding grounds.
3. How are Species at Risk and Significant Wildlife Habitat Screening be addressed and reviewed. Species on the decline and potentially on track to be endangered? Monitoring and preventative measures of invasive species being considered? There is a need to expand beyond the project site as area adjacent to site can be directly affected to.
4. Historical vs. Current habitat, flora, fauna presence. E.g. species detected in project area before, but not now. Absence does not exactly mean not there. How will this information be considered?
5. Climate change in combination with the project causes drastic changes to environment and landscape. There is a need to address potential climate change effects and how project can prevent and/or mitigate from amplifying effects, which will cause impacts on current use of lands and resources.
6. Effluent impacts on aquatic life in addition to water quality and the ecosystem. How will monitoring of effluent address the potential exposure and increase of toxic parameters?
7. How will cumulative effects be assessed at all stages of the project? How will these effects be assessed once the mine is no longer in operation? How are the cumulative effects of the mining districts of Timmins, South Porcupine and Kirkland Lake and Forest Management Units in the region taken into consideration as it impacts Aboriginal rights?
8. The frequency and duration of potential impacts to the exercise of Metis rights must also be considered. For example, Metis citizens loss of the right to harvest due to project construction and the impacts to the community.
9. Ensure methodology includes residual effects and significance determinations. For example, inclusiveness of Traditional Knowledge alongside modern science.
10. How will IAAC ensure collaboration between all Federal and Provincial Ministries?
11. How will the MNO be sufficiently educated on the evaluation metrics IAAC uses throughout the processes, e.g. what are the metrics to evaluate how impacts to Valued Components using both Western Science and Traditional Knowledge?

Potential impacts to health, social, or economic conditions

1. How will community and personal safety be assessed as it relates to Métis women, girls, and 2SLGBTQ+ citizens throughout the Project?
2. How will the potential impacts of income inequality be assessed as it relates to the Project?
3. How will the potential impacts on infrastructure and services used in urban environments be assessed?

4. How will social determinants of health be assessed, including impacts to the strained health system?

Other Recommendations

1. Update the name of the Traditional Territory (Abitibi Inland Historic Métis Community)
2. List all Indigenous groups alphabetically (or another format these shows there is no hierarchy).
3. Explicitly state in all documents, meetings, and forums that all Indigenous groups are equal but unique under s. 35
4. Inclusion of an Indigenous liaison throughout the entire IAAC process and present in all meetings.
5. The Impact Statement must include specifics on how impacts will be assessed and quantified (including metrics or rubrics) using MNO-specific examples and reviewed with the MNO so they are fulsomely understood.
6. Methodology must be included in the Impact Statement so that it is statistically significant and meets industry standards.
7. Integration with Health Canada, Substances Risk Bureau and Health Risk Assessment must be included in the IAAC process to ensure impacts to MNO way of life are addressed.
8. In order to adequately identify potential impacts and therefore how consultation should look, a more detailed project description should be included within the document that includes all physical aspects of the proposed project, but also project phases, frequency and duration.
9. What methods will be used to ensure the privacy and confidentiality of all shared documents?

If you have any questions please contact Victoria Stinson, Métis Nation of Ontario, Manager of Mining at <email address removed> or Dustin Schultz, Mineral Development Advisor- North East Regions at <email address removed> .

Marsi, Miigwetch, Thank you, Merci,

<Original signed by>

Victoria Stinson- Manager-MNO- Lands, Resources, and Consultations Branch

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