



Impact Assessment  
Agency of Canada  
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Agence d'évaluation  
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December 9, 2024

Sent by email

**Correspondence to Federal Directors**

Eva Lazar, Employment and Social Development Canada  
Jennifer McKay, Environment and Climate Change Canada  
Bradley Stewart, Federal Economic Development Agency for Northern Ontario  
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Hilary Oakman, Fisheries and Oceans Canada  
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Jennifer Mercer, Indigenous Services Canada – First Nations and Inuit Health Branch  
Natalie Pennefather, Indigenous Services Canada – Lands and Economic Development Branch  
Peter Unger, Natural Resources Canada  
Vera Haslett, Transport Canada  
Denise Gareau, Women and Gender Equality Canada

Dear colleagues:

**Subject: Request for Review of the Impact Statement for the Crawford Nickel Project**

On November 22, 2024, the Impact Assessment Agency of Canada (IAAC) received the Impact Statement for the Crawford Nickel Project (the Project) proposed by Canada Nickel Company (the Proponent). IAAC has determined that the Impact Statement is adequate to proceed with a public comment period and technical review.

The Impact Statement, including a summary in both official languages, has been posted on the Canadian Impact Assessment Registry Internet Site for the Project (CIAR #83857).<sup>1</sup> On December 9, 2024, IAAC announced the start of a public comment period on the Summary of the Impact Statement.

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<sup>1</sup> <http://iaac-aeic.gc.ca/050/evaluations/document/159943?culture=en-CA>

As per paragraph 23(a) of the *Impact Assessment Act* (IAA), IAAC requests that your department or agency<sup>2</sup> conduct a technical review of the information and studies contained in the Proponent's Impact Statement on which you have specialist or expert information or knowledge.

Attached to this correspondence are three enclosures with specific requests:

- **Enclosure 1** is a Federal Authority Advice Record for the impact assessment, ***due no later than January 24, 2025***.
- **Enclosure 2** will be used to update the Permitting Plan to support federal permitting coordination, and is ***requested by January 24, 2025***.
- **Enclosure 3** is about optional participation in IAAC's Indigenous consultation and public engagement sessions, ***requested by December 16, 2024***.

### **Enclosure 1 – Federal Authority Advice Record for the Impact Assessment**

The objective of the Impact Statement technical review is to ensure that IAAC has information that is sufficient and technically appropriate, including from the Impact Statement and views from federal expert departments and other participants, to conduct the assessment and prepare the Impact Assessment Report.

Specifically, the goal is to ensure that IAAC has adequate supporting evidence to understand the Project's potential effects<sup>3</sup> and be confident in conclusions about key issues that are material and relevant to decision-making. Expert advisors are asked to consider project context and regulatory context and provide risk-proportional, solution-oriented advice where potential gaps are observed.

To that end, Enclosure 1 requests federal expert advice to inform the impact assessment, in two steps:

- **Table 1** – Views for IAAC's consideration in the analysis of the Project's effects and preparation of the Impact Assessment Report, based on available information and situational context. This may include your department's own characterization of predicted

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<sup>2</sup> All subsequent references to department mean department or agency.

<sup>3</sup> "Effects" means effects within federal jurisdiction and direct or incidental effects (as defined in section 2 of the amended IAA) and considerations related to the public interest factors (as defined in section 63 of the amended IAA). Advice is also invited in relation to IAAC's separate obligations under section 79 of the *Species at Risk Act*.

residual effects and the level of uncertainty with predictions, validation of or suggestions for mitigation and follow-up measures, and other legislative frameworks that provide a means to address effects.

- **Table 2** – Deficiencies in the Impact Statement where missing information is both necessary to meet the requirements of the Tailored Impact Statement Guidelines and to formulate departmental views for IAAC (in Table 1) on matters that are likely to be material and relevant to decision-making under the IAA.

Deficiencies (Table 2) must be limited to information or clarifications that are necessary to formulate or substantially strengthen a conclusion required for decision-making under the IAA, in relation to the extent to which potential effects in federal jurisdiction may be significant, the identification of appropriate mitigation and follow-up measures, and whether those effects may be justified in the public interest, taking into account all lines of evidence available to develop reasonable conclusions.

Enclosure 1 also includes questions about 1) relevant legislative frameworks, policies, programs, and potential complementary measures that may help manage adverse effects in federal jurisdiction, and 2) whether your department has identified any power that it may not be able to exercise to allow the Project to proceed, in whole or in part.

IAAC will consider your input, along with information, knowledge and comments gathered through Indigenous consultation, public engagement, and its own review, and determine if the Impact Statement is complete and of sufficient rigour and quality for IAAC to conduct the assessment, or if it is deficient and information remains required.

As per Section 19(4) of the *Impact Assessment Act*, once IAAC has determined that the Proponent has provided all the required information or studies to conduct the assessment, it will post a notice on the Canadian Impact Assessment Registry website.

### **Enclosure 2 – Updating the Permitting Plan for the Project**

The *Cabinet Directive on Regulatory and Permitting Efficiency for Clean Growth Projects*<sup>4</sup> aims to make regulatory processes more transparent and predictable, and to accelerate decision-making for major projects.

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<sup>4</sup> <https://www.canada.ca/en/privy-council/services/clean-growth-getting-major-projects-done/cabinet-directive.html>

Further, the purpose of the IAA (section 6.1) is to prevent or mitigate significant adverse effects within federal jurisdiction by establishing processes to anticipate and assess the potential effects, to inform decision-making under the IAA or other Acts of Parliament.

A Permitting Plan<sup>5</sup> for the Project was issued in March 2023 based on information received during the Planning phase. Following receipt of the Impact Statement, the objective is to allow the Proponent to know, with the greatest certainty possible, which federal permits, authorizations and licenses (“permits”) are required for the Project, particularly those required to start construction.

Enclosure 2 will be used to develop an updated, more detailed, Permitting Plan for the Project and to provide guidance to the Proponent on next steps for applicable permits, to support federal permitting coordination to the extent possible.

### **Enclosure 3 – Indigenous Consultation and Public Participation**

IAAC may also require your department’s support in its Indigenous consultation and public engagement activities, which may include participation in meetings, review of submissions, or working with IAAC and participants to understand, assess, and address potential impacts on Indigenous peoples.

Please complete Enclosure 3 to confirm your department’s interest in participating in IAAC’s upcoming Indigenous consultation and public engagement activities on the Impact Statement.

If you have any questions, please do not hesitate to contact Grant Jensen at 226-750-8853 or [Crawford@iaac-aeic.gc.ca](mailto:Crawford@iaac-aeic.gc.ca).

Sincerely,

<original signed by>

Amy Sen  
A/Director, Ontario Region

Enclosures: 1) Federal Authority Advice Record – Crawford Nickel  
Project Impact Statement  
2) Updating the Federal Permitting Plan for the Crawford  
Nickel Project

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<sup>5</sup> <https://iaac-aeic.gc.ca/050/evaluations/document/147340>

3) Federal Authority Participation in Indigenous Consultation  
and Public Engagement Activities for the Crawford Nickel  
Project

cc: Amandeep Chohan, Employment and Social Development Canada  
Jason Maurice, Employment and Social Development Canada  
Blake Haskell, Environment and Climate Change Canada  
Denise Fell, Environment and Climate Change Canada  
Tallia Damini, Federal Economic Development Agency for Northern  
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Dae Young Lee, Health Canada  
Joel Kaushansky, Health Canada  
Umme Akhtar, Health Canada  
Kitty Ma, Health Canada  
Aaron Dorland, Indigenous Services Canada  
Julia Gregory, Indigenous Services Canada  
Debra Nkusi, Indigenous Services Canada  
Katherine Hess, Indigenous Services Canada  
Meng Koh, Indigenous Services Canada  
Imene Khaldi, Indigenous Services Canada  
Colter Kelly, Natural Resources Canada  
Natalie Robinson, Natural Resources Canada  
Christina Clarke, Natural Resources Canada  
Jeremy Craigs, Transport Canada  
David Zeit, Transport Canada  
Eun Seon Bae, Women and Gender Equity Canada  
Jessica Bialek, Women and Gender Equity Canada  
Megan Kirby, Women and Gender Equity Canada