



Impact Assessment  
Agency of Canada  
Ontario Region  
600-55 York Street  
Toronto ON M5J 1R7

Agence d'évaluation  
d'impact du Canada  
Région de l'Ontario  
600-55, rue York  
Toronto (Ontario) M5J 1R7

May 30, 2025

Sent by email

Pierre-Philippe Dupont  
Vice President, Sustainability  
Canada Nickel Company  
Suite 1900, 130 King St. W  
Toronto ON M5X 1E3  
[pierrephilippedupont@canadanickel.com](mailto:pierrephilippedupont@canadanickel.com)

Dear Pierre-Philippe Dupont:

**SUBJECT: Comments on the Crawford Nickel Project Impact Statement**

On December 9, 2024, the Impact Assessment Agency of Canada (IAAC) began a 60-day public comment period on the summary of the Impact Statement and a technical review of the Impact Statement for the Crawford Nickel Project (the project) proposed by Canada Nickel Company (the proponent). As part of its review, IAAC invited views on the potential effects of the project and outstanding information requirements from federal authorities, provincial ministries, Indigenous communities, and the public.

IAAC focused its technical review of the Impact Statement by placing emphasis on key issues relevant to decision-making as outlined in IAAC's letter to you on December 19, 2024. IAAC has determined that the Impact Statement does not contain all the information required for the conduct of the impact assessment. The proponent is required to provide the outstanding information outlined in Enclosure 1 – Comments on the Impact Statement for the Crawford Nickel Project (Enclosure 1).

The comments on the Impact Statement are publicly available on the [Canadian Impact Assessment Registry](https://iaac-aeic.gc.ca/050/evaluations/document/161755?culture=en-CA) (the Registry): <https://iaac-aeic.gc.ca/050/evaluations/document/161755?culture=en-CA>.

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**IAAC recommends that the proponent provide a response to Enclosure 1 as soon as possible to meet the time limit described below.**

All outstanding information required in Enclosure 1 was originally outlined in the Tailored Impact Statement Guidelines (TISG) and is thematically consistent with early technical discussions with the government review team on key issues identified by IAAC for resolution throughout the Impact Statement phase. Consistent with previous comments on draft materials, the outstanding information is largely related to water diversions, changes to flow, feasible offsetting for loss of fish habitat, and the downstream extent of contaminants, all needed to characterize effects in federal jurisdiction. The focus of Enclosure 1 is feasibility of concepts to support an impact assessment decision, reflecting the scale of the project, with consideration of permitting to refine details.

In preparing its responses, the proponent should engage IAAC, other participants, and Indigenous communities, as applicable, to ensure that the comments are clearly understood, and that the proposed responses will fully address the comments. To clarify expectations for the outstanding information, IAAC will reach out shortly to arrange technical meetings with participating federal and provincial authorities.

Next Steps

Once submitted, IAAC will verify that the response to Enclosure 1 meets the requirements to post it to the Registry. IAAC will then conduct a review of the information and use the response and other available information to inform decision-makers through the Impact Assessment Report.

Comprehensive information will reduce high uncertainty and allow IAAC to refine conclusions with regards to adverse federal effects, as well as appropriate key mitigation and follow-up program measures. Decision-makers will use the information in the Impact Assessment Report to determine whether the effects are in the public interest and, if allowed to proceed, the legally binding conditions in a Decision Statement.

When IAAC is satisfied that it has sufficient information to provide advice to the decision-maker, IAAC will issue a notice in accordance with

subsection 19(4) of the *Impact Assessment Act* (IAA), ending the Impact Statement phase, and beginning the Impact Assessment phase. IAAC must be satisfied, as per subsection 19(1), that it has the necessary information by March 31, 2026.

#### Maximizing Regulatory Efficiency

During the review of the Impact Statement, IAAC also invited comments from federal and provincial authorities on information required for other permits or authorizations that may be applicable to the project. IAAC is developing an updated, more detailed permitting plan that will provide additional clarity on the federal permits or authorizations that will be required, as well as key timelines, milestones and information requirements, to support meeting the objectives of the [Cabinet Directive on Regulatory and Permitting Efficiency for Clean Growth Projects](#). IAAC will contact you to arrange another meeting to discuss federal permitting coordination at a time that is convenient to you. Separately, IAAC will provide an email with references to provincial advice on information requirements for provincial regulatory processes.

In the interim, please refer to the Registry for government comments on what additional information may be needed for federal and provincial permits and authorizations. IAAC understands that Canada Nickel has determined that it would undertake the federal assessment first, followed by taking steps to seek federal permits, rather than aiming to work in parallel. IAAC encourages you to collect information and analysis needed to inform these regulatory processes during the impact assessment.

#### Time Limit

The three-year time limit to provide the required information, as set out in subsection 19(1) of the IAA, cannot be suspended. If the proponent does not provide IAAC with the required information by March 31, 2026, the impact assessment will terminate. The proponent is responsible for meeting the time limit, including allowing time for IAAC to determine it is satisfied it has sufficient information, prior to the subsection 19(4)

determination and notice. IAAC is available to discuss the time limit if Canada Nickel Company has any questions.

IAAC will follow-up shortly to arrange a meeting to discuss the comments as outlined in Enclosure 1 and answer any questions you may have. In the interim please do not hesitate to contact me by e-mail at [Crawford@iaac-aeic.gc.ca](mailto:Crawford@iaac-aeic.gc.ca) or by phone at 226-750-8853.

Sincerely,

Grant Jensen  
Project Manager

Enclosure: Comments on the Impact Statement for the Crawford Nickel  
Project

c.c.: Sydney Oakes, Canada Nickel Company  
Mathieu Boucher, Canada Nickel Company  
Chris Powell, Stantec