



File: ENVA-30200-20/MINI 26

Reference: 418924

January 14, 2026

SENT VIA EMAIL

Terence Hubbard
President
Impact Assessment Agency of Canada
22 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 (the Cooperation Agreement) for the proposed Baptiste Nickel Project (the Project).

FPX Nickel Corporation is proposing the construction, operation, and closure of the Project, a new open-pit mine located about 80 kilometres northwest of Fort St. James, British Columbia. The Project has been designed with a production capacity of 162,000 tonnes of ore per day to produce nickel over a 28-year operational mine life. The Project components will include an open pit, crusher, primary processing plant, tailing facilities and associated mine infrastructure. Offsite infrastructure will include a transmission line, access road(s), a freshwater supply system and a logistics and administration centre.

On January 12, 2026, the Environmental Assessment Office (EAO) received the Initial Project Description for the Project. The Project meets the thresholds for a reviewable project requiring an environmental assessment under the *Environmental Assessment Act* (2018) (the Act), as its proposed production capacity exceeds the thresholds set out in the Reviewable Projects Regulation respecting the construction of a new mine facility.

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I understand that Impact Assessment Agency of Canada (IAAC) also received an Initial Project Description for the Project on January 12, 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 thresholds for the construction of a new mine facility that, during operations, will have a production capacity of $\geq 5,000$ tonnes per day of mineral ore.

Coordination with IAAC

I have been informed that the EAO and IAAC intend to jointly initiate engagement with First Nations and the public shortly. In accordance with the Cooperation Agreement, I am submitting this request for substitution at this time to allow IAAC to consult the public and Indigenous peoples 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, and following that, the federal Minister of Environment and Climate Change (the Minister) will respond to this request for substitution.

As per the Cooperation Agreement, the EAO has been working closely with IAAC on a joint process for the EAO's Early Engagement and IAAC's Planning phase. This coordinated engagement helps facilitate a common process and seeks to issue joint documents where possible. The EAO is committed to this cooperative approach with IAAC throughout the review of the Project, and to collaborating on measures that meet our shared goals of maintaining strong environmental, social and governance policies, advancing reconciliation with Indigenous peoples and improving efficiency through eliminating duplication and improving decision timelines.

If substitution is approved by the Minister, the EAO commits to meet the legislative requirements of both Canada and British Columbia 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 the Subsection 22(1) of the IAA and fully assess the effects to areas of federal jurisdiction as defined in Section 2 of that Act, when conducting the assessment and providing an Assessment Report with the findings and conclusions to the Minister. The EAO will work with IAAC to consider the recent 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, British Columbia requests that the Minister approve the substitution of British Columbia's assessment process for the Project, should an impact assessment be required under the IAA.

Additionally, if the Minister approves the substitution request, consultation with Indigenous peoples, federal authorities and engagement with the public will be carried out by the EAO in accordance with the Cooperation Agreement and the 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>

Alex MacLennan
Chief Executive Assessment Officer and Associate Deputy Minister

cc: Christal Nieman, Project Manager
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