



The Honourable Steven Guilbeault
Minister of Environment and Climate Change
Canada
House of Commons
Ottawa, Ontario
K1A 0A6

Terence Hubbard
President
Impact Assessment Agency of Canada
160 Elgin Street
Ottawa, Ontario
K1A 0H3

April 11th, 2023

To the Attention of The Honourable Steven Guilbeault and Mr. Terence Hubbard

RE: Apitipi Anicinapek Nation's Joint Review Panel Request for the Crawford Nickel Project

Dear Minister Guilbeault and Mr. Hubbard,

Since the early development of the Crawford Nickel Project ("**Crawford Project**" or "**Crawford**") Canada Nickel Company ("**Canada Nickel**") has clearly demonstrated the importance of meaningful engagement and collaboration with the First Nations that could be impacted by our present and upcoming activities. Canada Nickel is walking the talk, signing early exploration agreements, jointly developing and implementing benchmark Impact Assessment Process Agreements (designed to increase the communities' capacity to be fully involved in the project's Environment and Social Impact Assessment), and partnering with communities to built key project infrastructure, thereby ensuring long term benefits.

Through this communication, Canada Nickel wishes to provide clarifying comments and put in perspective additional scoping concerns raised by Apitipi Anicinapek Nation ("**AAN**") in a letter dated April 5th, 2023. Canada Nickel also takes this opportunity to clarify the size, scope, and scale of the Crawford Nickel Project to ensure that the Canadian Impact Assessment Registry contains accurate information.

Canada Nickel has publicly stated that the Crawford Project is believed to contain one of the largest nickel sulphide resources in the world¹. As per the *Detailed Project Description* filed on December 12th, 2022, the life of the project is expected to be around 40 years at approximately 5.9 billion tonnes of material ("**Bt**"), including 1.7 Bt of ore and 3.6 Bt of waste rock (the remainder consisting of overburden) which will be mined and processed at a rate of 60,000 tonnes per day (tpd) at the start of mine life, ramping up to a maximum of 120,000 tpd.

To contextualise the Crawford Project, Ontario's Detour Lake Gold Mine and Quebec's Canadian Malartic Gold Mine are currently operating at similar rates to Crawford's initial scale. A further two active mines in Canada, Iron Ore Company of Canada and Highland Valley Copper's operations, and more than 40 base metals and Iron ore mines worldwide are operating with a larger throughput than Crawford's final proposed processing scale of 120 ktpd.

The Project area has been disturbed by previous infrastructure and industrial development (Highway 655, two transmission lines, extensive and repeated periods of logging). Canada Nickel believes that

¹ <https://canadanickel.com/wp-content/uploads/2022/07/2022-07-06-New-Resource-vF2-1.pdf>



developing a project within an already disturbed area will globally reduce the impact of the production of locally sourced Net-Zero critical minerals essential for Canada's ambitious decarbonization targets.

Through the Impact Statement and Impact Assessment process, Canada Nickel welcomes the opportunity to demonstrate how the company will minimise, mitigate and address any potential impacts to the environment and to the rights and values of Indigenous Peoples. It is also Canada Nickel's intention to co-design and implement state of the art environmental monitoring programs with the First Nation's impacted by the project.

While Canada Nickel has several very early exploration projects in the region, should the company wish to advance any of these projects they will be subject to their own assessment and permitting processes, as well as extensive, unique engagement with Indigenous communities and stakeholders. Canada Nickel has no intention of "grouping" any exploration properties with the Crawford Project to create a single project.

Canada Nickel intends to continue to engage with all Indigenous communities to identify and understand the potential impacts of the Crawford Project on the communities and their rights. We are committed to forging a respectful and mutually beneficial relationship with all impacted communities. Our relationships with Taykwa Tagamou Nation, Matachewan First Nation, Mattagami First Nation, and Flying Post First Nation are demonstrative of this commitment, and we hope to continue engaging with AAN in the same capacity.

Thank you for receiving our comments, and please contact me should you have any further questions.

Warmest regards,

<Original signed by>

Pierre-Philippe Dupont
Vice President, Sustainability and Environment
Canada Nickel