

Crawford Nickel Project – Impact Statement Review

February 4th, 2025

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General comments:

The project magnitude, scope and duration are expected to have long-term negative consequences for the ability of our nations to practice our traditions, our land use, and permanently alters the landscape of our ancestral territories.

The historic Treaty 9 and its adhesions are distinct because of the ‘Taken-Up Clause’ that the Crown may take up land for settlement, mining, lumbering or other trading purposes (Tsuji, 2021). The Treaty right to hunt, fish and trap became enshrined into the *Constitution Act of 1982*, however the Government of Canada can override these rights and develop on First Nations territories if a project was deemed to be in the public interest, of which is a non-Indigenous majority (Tsuji, 2021). Subsequent legislation has been passed for development in Northern Ontario, the *Green Energy and Green Economy Act*, the *Mining Amendment Act* and the *Far North Act* all contain similar clauses to override Indigenous interests in the interest of the public (Tsuji, 2021), perpetuating the erosion of First Nations rights and interests to their traditional territories.

In 2021 Ontario was the province with the highest number of First Nations peoples, representing 23.9% of the total First Nations population (Statistics Canada, 2023). There are more remote First Nations in Ontario than in any other region and urban centers with significant Indigenous populations include Thunder Bay, Sudbury, Timmins, Sault St. Marie, Ottawa and Toronto (Statistics Canada 2021). There are 133 First Nations reserves located across Ontario, 78% of First Nations communities located in Northern Ontario (Ontario 2022a). This large implications for a project magnitude proposed by Crawford Nickel, for Indigenous peoples in the RSA the potential implications are pronounced and need critical review via quality baseline data collection and research efforts, particularly in the context of urban centers.

Any advancement and innovations proposed by developers will lead to stronger relationship building and make steps towards reconciliation. It is also a shared responsibility by our municipal, provincial and federal governments to assume complimentary actions are committed within processes such as Impact Assessments and Environmental Assessments. Resource extractive developments are prevalent in more rural remote areas and continue to be a major contributor to job opportunities available in the north. It is expected that mining will continue to be a dominant economic driver for northern communities. In the context of the current government of Ontario, deregulation and ‘removing red tape’ to facilitate development in Ontario is paving the way for increased land use issues and rights interests conflict between First Nations peoples and external interests. The colonial structure of Northern Ontario is continually reproduced in the reserves system, the disparities by historic Treaty areas from the 2016 census show a 22.4% unemployment rate for on-reserve Indigenous people compared to 9.3% for Northern Ontario, and there is no publication of low-income data for individual on-reserve populations compared to non-Indigenous communities (Leadbeater, 2024). The comprehension of labour market conditions on

distributional outcomes in Northern Ontario depends on knowledge on the proportion of persons dependent on labour incomes like wages and salaries, including access to disaggregated statistics and information (Leadbeater, 2024).

Ontario promotes the that the mineral sector accounts for 11.2% of direct mining jobs for Indigenous people in the province and is purported to be the largest private sector employer of Indigenous people in Canada. Digging deeper, we see that Indigenous women in the mineral industry are severely underrepresented, despite many Indigenous communities being near mineral development projects across the rural north. The representation of women varies widely by occupational choices. Women's presence for the mining industry is particularly low because of the combination of jobs on a development site, many mining-centered occupations have less than 30% representation in 72% of jobs (Mining Industry Human Resource Council, 2024). Women's presence in the mineral industry is influenced more broadly by career pathways and is generally low in the skilled trades, with 3.6% of positions across Canada occupied by women, since trades account for 13% of mining employment, this has a big impact on representation of women in mining (Mining Industry Human Resource Council, 2024) this number is even lower when accounting for sub-demographics of Indigenous women and gender diverse peoples, which is touched on numerous times throughout this review.

Chapter 21: Assessment of Potential Effects on Health

Passages of Interest/ Relevance:

Table 21.2 'Mental Health and Social Well Being: Taykwa Tagamou Nation expressed concern regarding: – increased risk to community members due to influx of workers, as increased population growth may affect services related to health, safety, mental health, addiction and well-being. Flying Post First Nation expressed concern regarding a lack of dedicated health care centres that results in an insufficient understanding about mental and chronic health issues, as well as safety and security of members. These effects regarding increased risk to community members due to influx of workers, as increased population growth may affect services related to health, safety, mental health, addiction and well-being are addressed in this VC and in Chapter 22 of the Impact Statement.'

Table 21.2 '21.1.2: Community Safety: Apitipi Anicinapek Nation, Flying Post First Nation, Matachewan First Nation, Mattagami First Nation, and Taykwa Tagamou Nation and expressed concern regarding impacts on social well-being from in and out migrations, including crime rates, addiction, mental health, impacts to women, girls, and 2SLGBTQQA+, and discrimination and violence towards Indigenous peoples. [Mattagami First Nation expressed concern regarding human trafficking, especially as it is amplified by the presence of mining activities.] These concerns of in and out migrations, including crime rates, addiction, mental health, impacts to women, girls, and 2SLGBTQQA+, and discrimination and violence towards Indigenous peoples are addressed in this VC.'

21.1.6 Significance Definitions *‘A residual adverse effect of negligible to low extent of significance is one that, following the application of avoidance and mitigation measures, would result in effects on Indigenous health such that changes in physical health, mental health and social wellbeing, and community safety are largely unchanged from baseline conditions.’*

| Section | Reference | Excerpts/ Notes | Comment |
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| 21.2.1 | Methods | <p><i>‘Data were not disaggregated to the granular level of communities in the RSA and were typically reported at the health region level’</i></p> <p><i>‘Data were not consistently disaggregated by segments of the population including by gender, age, Indigeneity, or socioeconomic status’</i></p> <p><i>‘Data only reflect reported or diagnosed cases and may not accurately reflect those who are living with an undiagnosed condition or unreported incidences (e.g., incidences of gender-based violence)’</i></p> <p><i>‘Specific health data are not available for Indigenous nations in the RSA’</i></p> | <p>CNC makes on-site policies and a reporting mechanism in response to increased risk of human trafficking and crime, and notes that Cochrane, Smooth Rock Falls and Timmins have higher rates of crimes against children and trafficking but has no plans to collaborate with external partners to track disaggregate data in the surrounding communities, no external reporting mechanism that would liaise between city services and the corporation. There is no commitment to understand or assist with studies, monitoring committees or description of how the city is committing to monitoring programs. At minimum this should be considered a complimentary measure undertaken by the district and backed by the province, with collaboration from all stakeholders</p> <p>The City of Timmins needs to take a leadership role in filling data gaps, assisted by tangible commitments from developers in the region. The report from Porcupine Health Unit and Ontario notes that 21% of the population in the region is Indigenous! How could there not be disaggregated data for urban Indigenous people living in the region? Mining has been an ongoing activity for decades, while the legislation supports new reporting parameters, its highly concerning how leaders in the community and in development operations in the region have not flagged this long ago and taken steps to address this disparity. However, CNC did note that the Northern Policy Institute reported that 87% of Indigenous respondents to their survey from Timmins responded that they believe racism and discrimination was still a problem. This is a key priority issue that at minimum should be considered a complimentary measure and action taken by the municipality and the province as well as with CNC support to address data disparity.</p> |

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| 21.2.1 | Methods | <p><i>Table 21.5 GBA Plus population for group consideration ‘Indigenous women and Girls: Indigenous women experience disproportionate rates of being victims of violence, including intimate partner violence, physical and sexual assault, and homicide (Heidinger 2022). Resource extraction projects can exacerbate the serious problem of violence against Indigenous women through gender-based violence, workplace harassment, sexual abuse, and communicable diseases (National Inquiry into Missing and Murdered Indigenous Women and Girls 2019). Indigenous women and girls are also most at risk for housing insecurity (Bleakynney and Melvin 2022) (National Inquiry into Missing and Murdered Indigenous Women and Girls 2019) and therefore may be disproportionately affected by any Project-related effects to housing’</i></p> | <p>The methods section does not adequately characterize and describe the impacts of resource development on Indigenous women. There are several avenues that the implementation of a resource development project exacerbates the violence that Indigenous women experience including toxic workplace culture, economic reliance on industry, and disrupted family dynamics (Hettinga & Dean, 2023). To begin, Indigenous women and gender diverse people are more likely to experience workplace sexual harassment and violence when employed in resource development projects (Pauktuutit, 2025; MiHR 2022). This creates a large barrier for Indigenous women and gender diverse people hoping to access gainful employment through the industry. Further, when Indigenous women and gender diverse people are employed through resource development projects they are more likely to be hired in positions that are low-paying (i.e. hospitality services) compared to their male peers who are more likely to be hired for high-paying jobs (Gibson et al., 2017; Hettinga & Dean, 2023). The toxic work culture so often attributed to resource development projects impacts the wellbeing of local communities through the increase of human trafficking, substance abuse and addictions, sex work, and violence and harassment that accompanies the influx of workers to an area (Gibson et al., 2017; Pauktuutit Inuit Women of Canada, 2020).</p> <p>This description of Indigenous women, if meaningfully considering Calls for Justice 13.1-13.5 is failing to characterize the extent of potential impacts under consideration as a result of project development.</p> <p>Indigenous women and girls, two-spirit and gender diverse people are overrepresented as victims of violence in Canada, between 2009 and 2021 the homicide rate among Indigenous women and girls was six times higher than among non-Indigenous women according to</p> |

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| | | | <p>Statistics Canada (CIRNAC, 2024). According to data reported to Statistics Canada by 2019 Uniform Crime Reporting Survey, the rate of violence committed by someone other than an intimate partner was four times higher for women in remote areas (Burczycka, 2022). Testimonials from Indigenous women across Canada have emerged that substantiate linkages to major development industry operations and negative consequences for marginalized groups (Forester, 2022; Morin, 2020; Trumpener, 2022; WEA & NYSHN, 2016), however when researching numbers and analysis on this issue it immediately becomes difficult to begin to quantify the levels of violence incidents and other crime statistics for First Nations peoples in relation to resource developments, even more so when searching through provincial or regional reports in Ontario.</p> <p>The Standing Committee on the Status of Women for the House of Commons has tabled its report 'Responding to the Calls for Justice: Addressing Violence against Indigenous Women and Girls in the Context of Resource Development Projects' to the House of Commons. Their is informed by a series of briefs submitted by prominent First Nations, activists, research groups and Indigenous organizations that all identify and request action be taken to track and collect data on violence against women (FEWO, 2022). The calls are clear – we need research and program supports that can draw direct linkages of the impacts of transient workers and resource development operations in the rural north, and to provide additional resources that can respond to increased occurrences of violence because of nearby resource developments. In response the Government of Canada outlined actions it has taken including funding into research projects that investigate the Calls for Justice in resource developments and overall makes a commitment of ensuring 'resource development in Canada respects the rights of Indigenous Peoples; increases social infrastructure and wraparound services for Indigenous women, girls and 2SLGBTQQIA+ people in the resource development sector; and increases skills, representation and opportunities for Indigenous</p> |
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| | | | <p>women, girls, and 2SLGBTQIA+ people in the natural resources sector' (Parliament of Canada, 2022).</p> <p>Literature around Indigenous women and extractivism is increasing in a variety of disciplines but remains an under studied and ill attended factor in land use planning and economic development on all sides of development planning, therefore making the national inquiry critical to amplifying the lived experience of Indigenous women across the north. The environmental impacts of resource development projects are well documented however, the social impacts are often overlooked (Hettinga & Dean, 2023). The lived experience of Indigenous women, girls, and gender diverse people connected to resource development projects showcase how the presence of these projects exacerbates this violence (Gibson et al., 2017; Pauktuutit Inuit Women of Canada, 2020).</p> <p>All references to gendered impact mitigation are in relation to site specific practices and policies, the ways in which the developer may offer training, skills development, employment opportunities and implement policies and practices to reflect MMIWG and violence against women. Off-site impacts are acknowledged as important, however there is no translation of how that violence is embedded within a lawmaking instrument like the ministers decision statement. This is a logical way to try to exert control with some level of predictability over site-specific impacts but fails to account for a range of cumulative health and socio-economic impacts to Indigenous women off-site and in the project area. There are excellent workplace programs emerging to address gender disparities and barriers to accessing opportunities from both industry and government, however Indigenous women are underrepresented across resource development sectors in Canada (Baruah, B.; Biskupski-Mujanovic, S. 2023).</p> |
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| 21.1.3 | Potential Effects, Pathways and Measurable Parameters | Changes in community safety | <p><i>'4.4.2 How effect pathways inform mitigation and enhancement</i> <i>Clear effect pathways, including consideration of whether an effect is additive or synergistic, also inform effective mitigation and enhancement strategies by identifying specific points along the effect pathway where action can be taken to foster better outcomes, and achieve broad project and community goals. In particular, adverse effects that are additive or synergistic are critical to mitigate in order to avoid the creation (or magnification) of negative feedback to the community and environment.'</i> (IAAC)</p> <p>Linkages between project activity impacts are clearly articulated, less clear is how mitigation strategies are expected to lead to positive reduction in potential impacts, nor how CNC will adapt programs over time for emergent issues</p> |
| | Infectious Diseases | <p><i>'a. The top three diseases identified the Porcupine Health Unit were chlamydia, hepatitis C, and gonorrhea, which accounted for 99.4% of all cases locally'</i></p> <p><i>21.4.2.1.3 Change in Population Dynamics:</i> <i>'There is some evidence in the literature that out-of-region and temporary workers may participate in high-risk behaviours that can result in increased rates of STIs in communities, and that Indigenous women may be most affected by these</i></p> | <p>A potential mitigation measure that has been identified in the literature is providing sexual health education and screening for employees on-site (MiningWatch Canada, 2004a). Educating mine employees, especially male mine employees, about sexual health, HIV prevention, and providing accessible and free condoms can aid in creating a workplace where people feel more comfortable reporting violence and harassment (MiningWatch Canada, 2004a). Implementing regular screening and treatment for sexually transmitted infections for both men and women also might contribute to a safer and healthier workplace (MiningWatch Canada, 2004a). Additionally, making menstrual products available on-site and providing further supports for employees who menstruate will contribute to a supportive work environment.</p> <p>While the City of Timmins' economy is based on natural resource extraction, its foundation is built on gold mining and it is in fact a 'boom town' since the Porcupine Gold Rush. It is supported historically and contemporarily by logging and mining. Mining makes up approximately</p> |

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| | | <p><i>behaviours (Northern Health 2018, Prospectors & Developers Association of Canada 2022).’ For example, Northern Health (2018) summarized studies from Canada and around the world that have highlighted the negative impacts of resource development on STIs, sexual health, and sex work at the community level. However, these effects are often associated with remote projects, those with worker camps, and those associated with boom town communities, conditions that generally do not apply for the Project.’</i></p> | <p>13% of all jobs in Timmins (City of Timmins 2021), statistically speaking, one in ten people walking down the street are working in some capacity in mineral development. Additionally, as CNC is not intending to build camps it is logical to assume that the workers will uptake temporary housing via company owned properties for shift rotations, or people will move to the area and purchase houses, therefore CNC will have a direct impact on the socio-economic climate in Timmins and the surrounding region, including on sexual and reproductive health and community safety.</p> <p><i>‘Canada Nickel will have access to virtual physician support for their workforce and their families, 24 hours/day, and will develop a plan to manage communicable diseases as part of the larger HMSP’ This plan should be published as public documentation and is an opportunity for CNC to establish leading practices on community health and preventative care for their employees.</i></p> |
| 21.2.3.3.2 | Health Factors of Interest – Substance Abuse | <p><i>‘Timmins had higher rates of drug crime violations compared to the provincial rates, including rates that are approximately three times higher for total possession and total cocaine trafficking, production of distribution.’</i></p> <p><i>‘Since 2017, there has been a sharp increase in emergency department visits and deaths in the Porcupine Health Unit. Although provincial rates also</i></p> | <p>Measure undertaken by CNC would be to implement a drug and alcohol policy. Do other complimentary monitoring and information programs exist? How is CNC contributing filling knowledge gaps about industry activities and increases in drug trafficking in rural/ remote communities?</p> <p>How has the recognition of an opioid threat in Timmins been incorporated into the research and mitigation strategies for CNC beyond a standard policy?</p> |

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| | | <p><i>increased during this period, the rates for the Porcupine Health Unit are generally more than twice the provincial rates during this period. Fentanyl (all types) was identified as the type of opioid present at death for approximately 95% of the opioid-related deaths in the Porcupine Health Unit in 2021 and 2022'</i></p> <p><i>'While opioid statistics for Porcupine Health Unit are not disaggregated by Indigeneity, many Indigenous nations in Canada are disproportionately harmed by opioids (Hatt 2022). Locally, 24% of Flying Post First Nation, 43% of Matachewan First Nation, and 55% of Mattagami First Nation survey respondents indicated that substance use was a main challenge'</i></p> | |
| 21.2.3.4.4 | Family Dynamics/ Relationships | <p><i>'Rates of lone parent families in Mattagami First Nation and Matachewan First Nation are substantially higher than Ontario. Across all jurisdictions, one parent families are predominately parented by a woman+, indicating a gendered division of parenthood. The</i></p> | <p>See 27.4.4.3 Chapter 27 on residual effects on sub-groups.</p> <p>This impact works in synergy with the shortage of available childcare services in the region to place lone parent households and single mothers at a disadvantage to participate in the workforce, this comment is covered more in the social impacts chapter, and in suggested mitigations for Flying Post, Mattagami and Matachewan First Nations in the proposed mitigation strategies in Chapter 27 comments.</p> |

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| | | <p><i>prevalence of lone parent families for communities in the RSA are summarized in Table 21.18.'</i></p> <p><i>'One parent families with female headed households: Matachewan Reserve Lands 20% Mattagami Reserve Lands 25%'</i></p> | |
| 21.4.2.1.5 | GBA Plus Considerations | <p><i>'Low-income (including persons living with a disability or lone parent families) households, including those of Indigenous peoples, may be more susceptible to potential changes in Project-related cost of living and food insecurity as these populations already experience disproportionate rates of food insecurity. Therefore, any potential changes to cost of living as a result of the Project may place these populations and their families at a disadvantage and risk of becoming food insecure. Potential changes of cost of living due to the Project may also contribute to these segments of the population struggling to find safe and affordable housing, thereby</i></p> | <p>Refer to Appendix E – Summary of Commitments</p> <p>It's assumed that CNC has committed to address this via contributions through its community contributions program for local communities. How is CNC making targeted contributions to food security in the RSA – this is a reportable parameter that could form part of monitoring programs</p> <p>Collaboration with local organizations to collaborate on impact identification and mitigation measures – what organizations? How will this be tracked and addressed?</p> |

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| | | <i>risking increased homelessness or overcrowding. These potential effects may further affect child development.'</i> | |
| 21.4.2.2 | Mitigation and Enhancement Measures | <i>'Canada Nickel will develop a Health and Medical Services Plan (HMSP) to manage occupational and non-occupations injuries and illness. This will include provision of medical care at the Project site through the onsite presence of medical personnel. Canada Nickel will also make available an on-line physician 24 hours/day. The HMSP will also include procedures to manage communicable diseases and access to an Employee Family Assistance Program (EFAP).'</i> | Off-site impacts considerations suggested throughout the comments |
| 21.4.2.2 | Mitigation and Enhancement Measures | <i>'Canada Nickel will increase flexibility in work schedules to enable the continued participation of Indigenous employees in traditional and cultural activities.'</i> | No articulation of how this will be achieved in any of the chapters or appendices |
| 21.4.2.3.4 | Changes in Employment Conditions | <i>'At present, it is estimated that Timmins has 359 individuals at risk of or experiencing homelessness and</i> | Accommodations Plan should be made available publicly and routinely evaluated to accuracy and for potential intervention opportunities such as funding applications or other capacity building endeavors of local organizations |

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| | | <p><i>vacancy rates of less than 1.5% as of April 2024 (City of Timmins 2024). As such, this scenario could lead to insufficient availability of accommodations and inflation in the housing market, which could mean those with lower socio-economic status (e.g., income) could be lead further into poverty or homelessness due to the competitive housing market and housing costs. The City of Timmins acknowledges that mining related employment is expected to increase and notes that there is demand for housing at every price point in the market (City of Timmins 2024). As noted above, Canada Nickel has plans to undertake an accommodations study and is in discussion with third parties to explore options to provide accommodations for Project workers.'</i></p> | |
| 21.4.2.3.5 | GBA Considerations | <p><i>'Crawford Nickel will have mitigation measures in place that are meant to alleviate these effects. For example, hiring practices have been developed to encourage employment of Indigenous</i></p> | <p>Sexual and reproductive health considerations are not mentioned, nor are disparate impacts to Indigenous youth or potential risks of increased opioid use because of worker incomes, and the negative implications that this will have on marginalized sub-groups in the surrounding communities. All of the mitigation practices that are tangibly mentioned within the mitigation strategy are employment centric.</p> |

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| | | <p><i>peoples, local youth, women, and under-represented populations; Canada Nickel will provide access to an EFAP; and Canada Nickel is developing Code of Conduct and Ethics, Violence and Harassment, Diversity and Inclusion, Fit for Duty, and Cultural Awareness policies. Canada Nickel has also made, and will continue to make, contributions to support social, economic, health, and other activities/programs for local communities through its Community Contributions Program. Canada Nickel will continue future collaboration with recreational, social, economic, municipal, and health groups to identify impacts and develop mitigation measures.'</i></p> | <p>Additionally, specific mitigation strategies that would contribute to social, economic, and health activities and programs are made through 'Community Contribution Programs' which have a maximum contribution limit of \$5000.00 or legacy contribution programs for over \$5000.00, at CNC's discretion which is a positive strategy and remains reflexive to emergent issues. It would be beneficial to understand a total dollar commitment CNC intend to provide to activities for the duration of the project.</p> <p>It also remains unclear how Indigenous communities are represented within a public process such as the IA, rather than constrained within specific parameters in an IBA, particularly in the context of beneficial projects for Indigenous populations in the region.</p> <p>Because of the identified links of large-scale development project impacts on the LSA and RSA, and at this phase of the development process there should be tangible and verifiable commitments from all stakeholders in how the impacts of CNC (direct, cumulative, residual) would be addressed. In the context of CNC lending capacity for further study, collaborative initiatives or specific funding tracts to address impact mitigation strategies off-site of project activities could be positively supported and demonstrated in the Impact Statement.</p> |
| 21.4.3.2 | Mitigation and Enhancement Measures | <p><i>'Canada Nickel is participating in the initiative "Equal by 30", which aims to increase benefits to women and to accelerate gender equality and diversity to close the gender gap by 2030'</i></p> | <p>Equal by 30 recognizes the importance of reporting on progress and will support efforts to improve the collection of gender disaggregated data so that we can and report on our progress in a transparent, open manner.</p> <p>Equal by 30 aims to set high standards for the recruitment, promotion and participation of women, adopting more rigorous requirements where necessary.</p> <p>In the mining sector, intersectional employment statistics of the 2016 census data presented by Mining Industry Human Resources Council</p> |

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| | | | <p>show that Indigenous women made up 1.7% of the total proportional representation of mining jobs in Canada (Peltier-Huntley, 2022). While we expect this number to have increased since the IAA 2019 legislation has been passed, we argue that the effectiveness of site-specific practices as outlined in decision statements is creating a small modicum of positive impact and does not adequately reflect residual effects, regional socio-economic consequences and cumulative effects on surrounding communities. Indigenous women's near total lack of representation in the mining industry is arguably demonstrative of a lack of willingness to engage with industry activities, and there is overwhelming need to strategize impact mitigation outside of site-specific strategies, but proponents are unwilling to take on responsibility of the structural impacts of resource development in the north and Indigenous women are falling through the cracks.</p> <p>In the context of single parent households and surrounding communities, the need for targeted recruitment and retention parameters and innovative employee investment programs that consider extenuating circumstances such as childcare and rotational work schedule amendments need to be fully investigated by CNC and reported publicly.</p> <p>Additionally, CNC should include their policies in public documents in their Impact Statement. Making policies publicly accessible in the documents such as the Initial Project Description, Detailed Project Description, and Impact Statement would allow for further analysis of how the project will consider impacts on Indigenous women. Proponent policies that outline dispute resolutions, grievance processes, and sexual harassment and violence actively showcase the level of safety for women on-site. This information is important for evaluation of the risk that a project will pose for Indigenous women in impacted communities and on-site. Additional considerations for the inclusion of proponent policies is that proponents should include information on employment training materials and what the active</p> |
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| | | | <p>incorporation of GBA+ strategies looks like for the project. A step beyond commitment for including policies in IA documents would be for proponents to discuss the strategic vision and policy making for the project with clearly defined goals that include mitigation strategies for both on-site impacts, and where feasible and appropriate, off-site impacts as well.</p> |
| 21.4.3.2 | Mitigation and Enhancement Measures | <p><i>Canada Nickel has or will be developing several policies, procedures, and training programs which will mitigate adverse effects on services and infrastructure. These are: – Health and Safety Policy – Local Procurement Policy – Code of Business Conduct and Ethics – Workplace Violence, Harassment and Discrimination Policy – Diversity and Inclusion – Fit for Duty, including Drug and Alcohol Policy – Cultural Awareness Training</i></p> | <p>We applaud CNC for adopting a rigorous and comprehensive policy review and implementation plan. We would like to see Recruitment and Retention and Skills Development and Employee Investment programs to be listed in the proposed policy development.</p> <p>We encourage CNC to make these documents public facing to increase transparency on innovative leadership in industry practices. Additionally, we would like to see CNC build the capacity of SME's to undertake similar policies and procedures as the corporation has the resources and influence to effect positive change within it's contractors and service providers, particularly in the context of grievance reporting and employee education programs and policies. This supports GBA+ implementation across the supply chain and industry providers and is a shared responsibility throughout the industry not just on CNC.</p> |
| 21.4.4.2 | Mitigation and Enhancement Measures | <p>(See Table 21.2 '21.1.2: Community Safety) For reference.</p> <p><i>'Canada Nickel has developed an internal Whistleblower Program for employee feedback and communication of concerns, as well as an external feedback mechanism</i></p> | <p>How is the feedback mechanism publicly available for people to access? How is the general population given access to such a reporting portal; how will dissemination of this tool occur? Define more specifically the purpose, intent and applications of this type of mitigation measure.</p> <p>Part of transparency is reporting on how policies are intended to positively contribute to public safety and worker accountability. Supports public facing documentation of policies and procedures,</p> |

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| | | <p><i>to capture Project related comments and concerns from community members'</i></p> <p><i>'To manage Project-related demands on police services and to enhance the safety of women in the community and at the site, Canada Nickel will provide security at the site and implement several workplace policies which will limit adverse behaviours in the community'</i></p> | <p>including HR mechanisms in place to enforce disciplinary measures and grievance processes.</p> <p>*See other comments regarding data disaggregation, supportive initiatives and tangible commitments to addressing violence against marginalized sub-groups*</p> <p>While internal policies and practices are important steps to addressing MMIWG on-site there is still the issue of off-site impacts to Indigenous women and gender diverse people that remains to be seen if it can be addressed through the Impact Assessment process. While CNC acknowledges the increased risk Indigenous women, girls and gender diverse persons will experience as a result of the addition of another resource development project to the region there is one actionable item that addresses the off-site behaviour of transient workers connected to the CNC project. This action item describes that CNC will develop and implement a feedback process to hear concerns from residents and members of vulnerable groups. It is not clear if this feedback process will result in actionable items or if the feedback process will actually provide a space for off-site grievance reporting.</p> |
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Chapter 22: Assessment of Potential Effects on Social Conditions

Notes:

Our people believe that water nourishes all of the beings of creation, water is pure and sacred, and cleansing. The impacts to water bodies on traditional territories has gender-specific impacts for First Nations people, particularly women. Water has spirit, it contains emotion and is considered the lifeblood of mother earth. Babies are carried in water, and born from it, and the consumption of water sources can directly impact on the health and well-being of people, and for mothers and their unborn children. It is highly significant and consequential to Indigenous peoples when pollutants are allowed to be disposed of into water bodies, and people have expressed grief over not being able to drink directly from lakes and rivers any longer. The city of Timmins has historic and ongoing issues with water pollution and effluent disposal into lakes and rivers in the area. Effluent disposal by CNC into the river system is a negative impact to Indigenous cultural well-being, spirituality and life hood.

Gender analysis which works to understand the qualitative differences between genders in each context. Leveraging study findings requires input from men and women to ensure support of proposed interventions/ strategies. It may also help determine what barriers may exist around participating, as well as how gender may impact program outcomes.

There are great opportunities for implementing focused programs that are oriented around responding to study findings and responding to expected impacts of development proactively and strategically. Program areas of focus are action oriented and are introduced from planning outset, not simply reacting to problems as they emerge, (ex. local employment readiness, safety and security, workplace, resourcing funds, inter-organizational communication and reporting parameters, environmental monitoring, emergency response, empowerment projects, education and training, entrepreneurship programs, cultural projects, health and well-being, etc.)

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| Table 22.2 | Potential Effects, Effect Pathways and Measurable Parameters for Social Conditions | <p>Social impacts assessment parameters are limited to:</p> <p><i>‘Services and Infrastructure: Change in demand for services and infrastructure, accommodation availability, demand for transportation infrastructure</i></p> <p><i>Land and Resource Use Change in land use designations, Recreation, resource use’</i></p> | <p>Social impacts can be direct, indirect and induced, and can interact cumulatively with other developments and have an overlapping effect with other projects. The issues to be addressed through a social impact assessment should be derived from discussions with stakeholders, they can include concerns about safety and security, in-migration and population stability, human rights, gender relations and quality of life among other topics (Golder Associated Ltd. 2019).</p> <p><i>‘Various principles have been identified to guide SIA practice. Examples include commitment to sustainable development, openness and accountability, fairness and equity, local empowerment and capacity building, enhancement of the position of women, minority groups and other disadvantaged or marginalised members of society; possible alleviation of some forms of dependency; a focus on poverty reduction and support for human rights’</i> (Golder Associates Ltd. 2019).</p> <p>The social impact assessment prepared by Stantec isolates concerns for the safety and socio-economic impacts within the HIA however many of the indicators collected by First Nations and by locals would be applicable to the SIA chapter, this chapter is limited in scope and does not account for the range of concerns brought forward, therefore limiting analysis of potential mitigations and</p> |

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| | | | <p>contributions to offset the negative social impacts of a project of this magnitude. CNC could review the processes implemented by the Mackenzie Valley Review Board for additional guidance.</p> <p><i>‘Despite the potential overlap between health, social and economic effects within an impact assessment, the proponent must demonstrate that the relevant potential social effects of the project were evaluated as part of the Act. In some cases, this may mean clearly articulating in an effect pathway how a VC has both social and health effects (e.g., community safety).’ (IAAC 2024b).</i></p> <p>While places and resources, and community services and infrastructure are captured within the ‘Potential Effects, Pathways and Measurable Parameters’, IAAC guidance clearly indicates that community well-being, household well-being and human rights factors may be considered in an SIA (IAAC 2024b).</p> <p>Flying post, Matachewan and Mattagami First Nations all expressed concerns specifically related to housing security, intersectional impacts to elders and youth, influx of workers, discrimination, and human trafficking (pulled from 7.2.2.2.2 Socio-Economic Study in Chapter 7 of the Impact Statement). Only the housing component is addressed in the social impact chapter prepared by CNC.</p> |
| 22.2.2.1 | Housing and Temporary Accommodations | | <p>The collectively shared concern between all three impacted nations was access to housing, and the implications for intersectional sub-groups in their communities. Yet while CNC has incorporated this into effect pathways in Table 22.2 of Chapter 22, there is a failure to quantify or address specific impacts on vulnerable sub-groups within the measurable parameters, nor is there a comprehensive study done on specific housing needs beyond number of projected</p> |

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| | | | <p>employees, or housing stock available in the RSA and forecasted impacts on availability, pricing, the Accommodations Management plan is not complete at the time of this IS submission.</p> <p>We are pleased that the City of Timmins and NGO's in the region are looking to undertake affordable housing projects, however there are no timelines listed or commitment to make these projects a complementary action within the Federal Assessment process, thereby undermining the regulatory opportunity to intervene in an ongoing and complex socio-economic landscape in which the project is proposed to be undertaken.</p> |
| 22.4.2.2 | Mitigation Measures | | <p>We are pleased to see that CNC has committed to collaborative training and education opportunities with training institutions. Targeted opportunities for Indigenous peoples in the region is a positive step towards reconciliation. CNC could consider on-site apprenticeships and job placements for local Indigenous people trying to acquire skills trades certifications/ skills.</p> |
| 22.4.2.2 | Mitigation measures | <p><i>Canada Nickel has or will be developing several policies, procedures, and training programs which will mitigate adverse effects on services and infrastructure. These are: – Health and Safety Policy – Local Procurement Policy – Code of Business Conduct and Ethics – Workplace Violence, Harassment and Discrimination Policy – Diversity and Inclusion – Fit for Duty, including Drug and</i></p> | <p>CNC is developing a comprehensive policy base for site specific impacts, we recommend the addition of specific parameters to be addressed within the policies in a tiered approach, showing executive leadership for specific measures to create an environment of positive relations and project accountability. Based on research on industry best practices and experience doing primary research with impacted Indigenous women working on development sites, and/or living in close proximity to development sites with familial/community linkages to major projects, we recommend the following policies to be expanded by CNC to include:</p> <p>Corporate Level (<i>applies to everyday operations AND special executive responsibilities</i>)</p> <ul style="list-style-type: none"> • Grievance mechanisms and procedures • Equity Diversity and Inclusion |

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| | | <p><i>Alcohol Policy – Cultural Awareness Training</i></p> | <ul style="list-style-type: none"> • Sponsorship and Donation Programs • Research and Policy Review • Organizational Culture • Employee Skills Development and Investment • Recruitment and Retention <p>Site Specific Level (<i>applies to everyday operations</i>)</p> <ul style="list-style-type: none"> • Site Specific Committees and Programs • Conflict Resolution and Cultural Protocols • Whistleblower Reporting Mechanism • Physical Spaces and Environment • Safety and Dignity <p>To effect positive advancements in addressing intersectional issues in the north, or at least reduction in compounding them, leaders need to recognize and embrace gender equity practices and challenge injustices while institutionalizing gender transformative policies in an iterative and reflexive way (Munive et al., 2022). It is critical that leadership in both public and private spheres implement leadership practices that promote change. Leaders must define the purpose and long-term vision for equality in a given sector, generate commitment through building value, foster an organizational culture that embraces and values diversity, to access and build diverse partnerships that collaboratively work towards common vision, in an effort to redistribute power and resources to drive social change (Munive et al., 2022). Leaders must become personally invested in gender equality to drive change (Munive et al., 2022). This applies to all stakeholders with interest in a project like Crawford Nickel.</p> <p>Offsetting social and health related impacts is fostered with integrative strategies that are both a technical and political process. It is technical in the sense that there are specific and measurable tasks that can be carried out, like implementing staffing, altering/ implementing organizational regulations and procedures that reflect the specific needs of diverse staff, targeted training, and</p> |
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| | | | <p>professional development for all genders, etc. (Bhatta, 2001). It is a political process in that there is a need to shift organizational culture, ways of thinking and doing, and an all-hands-on deck commitment to address barriers and enhance women’s participation in the development process, via policy making, agenda setting, planning, implementation, and evaluation (Bhatta, 2001). CNC has strong evidence of taking inventory of existing services and supports (or lack thereof) and evaluating vulnerabilities and areas of impact, however there is not much description linking impact mitigation strategies to wider issues.</p> |
| 22.4.8 | <p>Summary of Effects on Sub-Populations Identified Through Gender-Based Analysis Plus</p> | <p>On the subject of lack of available childcare services, and to disproportionate impacts for accommodations in vulnerable sub-groups, CNC among other things has committed to:</p> <p><i>‘Canada Nickel will develop a Diversity and Inclusion Policy, which encompasses respectful workplace behaviors for diverse groups, such as Indigenous nations, local youth, seniors, 2SLGBTQQA+, visible minorities, persons with disabilities and members of the GBA Plus community. Such a policy and subsequent training consist of awareness training for non-Indigenous employees to foster a respectful working</i></p> | <p>The lack of childcare options available in resource dependent communities is also reported frequently in the literature (Gibson et al., 2017; Manning et al., 2018; MiningWatch Canada, 2004a). Work schedules do not present accessible hours for Indigenous women and gender diverse people with children, in the context of shift work between night and day there are additional limitation to accessing gainful employment in industry operations.</p> <p>Industry workforce relies on the unpaid labour provided by family and friends of their children and dependents. While this is a cost savings and practical way to address childcare it leads to cumulative effects of spouses and family members having to make up for the lost time of the other parent being away without respite in many cases. The nature of rotational shifts isolates parents away from each other and impacts family dynamics consequently. Indigenous women, gender diverse people, and their families are providing hidden labour for resource development companies and SMEs through childcare and periphery services and supports to keep households running. This labour should be recognized, accounted for, and compensated by all stakeholders. On the part of CNC this may look like equity packages for Indigenous women seeking employment in industry</p> |

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| | | <i>relationship with Indigenous employees and contractors.</i> | Women are more frequently identified as the primary caregivers of children and due to limitations in affordability, accessibility, and availability of childcare services women are often excluded from full-time employment in resource development projects (Gibson et al., 2017). There are ongoing initiatives to create home based childcare-centers across districts in the north, recommend establishing childcare options that cover overnight arrangements. CNC may consider educational development program expansion to support the tuition coverage for ECE's looking to provide childcare in the RSA, in order to boost available workers in the region and positively contribute to socio-economic impacts of influx of population on marginalized/ excluded groups. This has benefits to lone-parent households and may positively impact Mattagami and Matachewan First Nations membership in accessing employment opportunities. |
| 22.8 | Follow Up and Monitoring | 22.8.1 Services and Infrastructure 22.8.2 Land and Resource Use | <u>Disagree</u> that there is no need for ongoing monitoring of impacts to services and infrastructure, key indicators of impact and monitoring need to be co-determined with the socio-economic impacts committee and with the impacted First Nations communities. This can include reflecting regular municipal and health research and statistics in Crawford Nickel annual reporting metrics to the agency. This supports CNCs ongoing attention to land use practices and trends over time, particularly at the height of construction phase there are instruments associated with risk assessment and monitoring that can be implemented in on-going communication channels with minimal expense and high feasibility. |

Chapter 23: Assessment of Potential Effects on Economic Conditions:

Passages of interest/ relevance:

'Based on the composition of similarly sized past mining and construction projects, it is reasonable to expect that the local labour component would not exceed 20% of the Project labour force. Therefore, the peak construction labour force of approximately 2,000

persons could be comprised of 400 local residents and 1,600 non-local workers. During operations, the peak labour force of nearly 1,400 could include 280 local residents and 1,120 employees from outside the LSA/RSA. Considering typical work rotations for similarly sized mining and construction projects, it is likely that 75% of the labour force during constructions and operations will be on-site at any one time.’

| Section | Reference | Excerpts/ Notes | Comment |
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| 23.1.1.2 | Provincial Requirements | Ministry of Mines and Ministry of Economic Development, Job Creation and Trades | <p>The province of Ontario needs to affirm support of complimentary measures to assist Canada Nickel in responding to deficits in skilled labour, employment and educational opportunities. Timmins is experiencing a shortage of skilled labour to meet workforce demands of up-and-coming mineral development operations. In the context of workforce development educational institutions, second-career training and the creation of apprenticeships and training program is critical to acquire the skilled workers to maintain professional positions throughout the mine cycle.</p> <p>What commitments has the municipality made to support CNC? What has the province done to re-invest the forecasted mineral revenues back into northern communities in the RSA? We call on the ministries to make direct commitments to the public that would compliment and assist CNC to maximize the positive impacts of Crawford Nickel Project and maintain a skilled and ready workforce in the north.</p> |
| Table 23.5 | Educational Attainment in LSA and RSA | Apprenticeship or trades certificates or diplomas men hold 77% and women hold 23.5% in the RSA, 80.9% and 21.3% in the LSA respectively (Indigenous men and women) | <p>Apprenticeships and trades certification rates may have increased or changes since the 2021 Census. However as was outlined in the above comments, Indigenous women continue to be underrepresented across the board in skilled trades and mining industry positions, particularly in the context of trades labour jobs, in transportation and equipment operators (Table 23.8), natural and applied sciences, and natural resources related occupations.</p> <p>Long term mentorship and growth into new career pathways is currently being supported by different levels of government and in communities who rely on resource development, particularly in the</p> |

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| | | | <p>rural north. There are a lot of ‘fast-training’ and job-readiness focused training which is crucial within the constraints of project timelines upon the commencement of an Impact Assessment. However, there remains a fundamental issue of lack of education and on-the-job skills and training for Indigenous women to succeed in these spaces, beyond the timeline of the current Impact Assessment process.</p> <p>Canada Nickel has provided a forecasted list of jobs created which can give the surrounding communities valuable information about how they may provide targeted training to their membership in preparation for a major project, particularly focusing on skills development for youth and second career opportunities for marginalized community members who are willing and able to work with the right supports.</p> <p>Occupations with a small labour pool should focus on workforce development and is indicative of positive opportunities for CNC to implement robust work readiness programs, collaborative training initiatives and job-placements and apprenticeships on the project site, we seek to understand how CNC will contribute to development of the Indigenous workforce, particularly in the context of positions that will give career opportunities for impacted Indigenous communities and go beyond the construction phase of the project. This is a mutually beneficial initiative as there is a predicted 44% vacancy rate of positions needing replacements for the mining workforce in the region, providing an opportunity to leverage community relationships and investments to position impacted First Nations peoples for long-term success.</p> |
| 23.4.2.2 | Mitigation and Enhancement Measures | <i>‘Canada Nickel will participate in initiatives aimed at addressing wage inequality among Indigenous populations through working with</i> | No official relationship has been entered into with Crawford Nickel at this time, however the company has committed to hiring Indigenous women at their project site. Keepers of the Circle is invested in supporting women in Skilled Trades and participation in industry workforces such as mining, manufacturing and other trades career |

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| | | <i>organizations such as Keepers of the Circle'</i> | pathways and can provide pre-employment training services to impacted urban Indigenous peoples in the region. |
| Table 23.21 | Impacts from taxation, operational expenditures | <i>'Corporate income taxes on Project related revenue are estimated to produce over \$4 billion Canadian in government revenue'</i> | <p>Complementary actions taken by municipal, provincial and federal governments need to reflect reinvestment of profits into northern communities. The boom-and-bust cycle of development in the mineral sector particularly is not a new concept, it is repeatedly observed on a global scale. Ontario has a long history with mineral development in the rural north. Approximately 95% of the land in Northern Ontario is unorganized, its considered Crown land and managed mainly by the Ministry of Natural Resources and its economy is based primarily on resource export and transportation corridors (Leadbeater, 2024).</p> <p>Northern Ontario is founded on the colonial conditions that include 87% of the land mass of Ontario, central to this is the dispossession and segregation of Indigenous peoples to reserve lands, which form less than 1% of Treaty areas and the systematic denial of sovereignty and continued cultural genocide (Leadbeater, 2024). Ontario's growth plans show the issue of 'studying the colonial economy without perceiving colonialism', masking the need for critical research in Northern Ontario about resource extraction, ecology, different future growth opportunities, and more democratic representation of Northern communities and their fundamental relationship to ownership, control and use of lands and resources (Leadbeater, 2024).</p> <p>Ontario's mining royalty tax is based on net profits of 10% for most mines, with 5% rate given to qualifying remote mines, notably Ontario has added the Economic Development Allowance which allows for deductibility of certain payments made under IBAs with First Nations, and other qualifying charity donations and contributions, and has one of the lowest profit-based royalties taxation rates in Canada (MAC, 2008). Northern Ontario itself is founded on the denial of First Nations peoples land rights (Angus, 2022). Communities that are or were the key centers of resource production are now some of the most</p> |

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| | | | <p>underdeveloped (Angus, 2022). Northern mining communities such as Timmins have historically and contemporarily generated enormous wealth for the province but have chronically underfunded infrastructure and have poor taxation systems that create barriers for resource-based towns to economically diversify which and has far reaching consequences for architectural investments, urban planning and environmental awareness (Angus, 2022).</p> <p>Mining Operations are a significant industry represented in rural northern Ontario, with thousands of mineral staking claims and exploration projects occurring across the north. The dispossession of Indigenous lands is facilitated through the institutionalization of sub-surface property rights and is predicated on the erasure of Indigenous claims to lands (Hoogeveen, D. 2015). The Mining Act in Ontario is being challenged as infringing on First Nations rights by awarding mining claims without consultation by seven different First Nations, currently in progress (King, R. 2024).</p> <p>This all to say that actions based on existing regulatory processes are not necessarily capturing the cumulative effects of major developments in the north on the social fabric, economic and health considerations that are being maintained and perpetuated by major developers in the north. Nor are the impact mitigation pathways leading to the realization of reconciliation and respect of the traditional land users or wider northern communities as a whole.</p> |
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Chapter 27: Assessment of Potential Effects on Flying Post, Matachewan and Mattagami First Nations Interests:

Notes:

The recommendations made are informed by policy research and national strategic goals of First Nations peoples and the Federal Government. Intersectional considerations that would apply to the regional study area and therefore encompass the city of Timmins were not included in the residual and cumulative effects assessment and characterization tables.

The commitments made by CNC to mitigate and offset impacts to WTC Nations would arguably be best conveyed within the context of the Impact Assessment, regarding EDI targets; Wildlife monitoring programs; Health and well being indicators and so on – repeatedly throughout the Impact Statement there have been references to IBA negotiations which should arguably address Economic and Treaty rights infringement and restitution considerations. This distinction is not made apparent how the proponent intends to commit to transparent and publicly enforceable conditions that would have blanket applications to wider sub-demographics of northern people.

Analytical Assessment Techniques utilized by Stantec to conduct the effects characterization we're presented to WTC with very little context or explanation, Flying Post, Matachewan and Mattagami First Nations did not participate in effects characterization weighing or have meaningful opportunity to co-create study design elements or subsequent evaluation of rights impacts and cumulative effects.

| Section | Reference | Excerpts/ Notes | Comment |
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| 27.1.2 | Influence of Engagement on the Assessment | <i>'Engagement efforts have been developed to be consistent with the Government of Canada's commitment to implement the UNDRIP as a comprehensive international human rights instrument and Canada's roadmap for reconciliation.'</i> | <p>One of the key aspects of UNDRIP implementation is the right of self-determination for First Nations peoples. In the context of Impact Assessment guidance this is expressed within the 'Guidance: Assessment of Potential Impacts on the Rights of Indigenous Peoples' there are considerations nested outside of the specific Treaty impacts of the right to Hunt, Fish and Trap, indicators may be expanded to include elements of economic, social and health determinants which have been provided via ongoing consultations with the communities.</p> <p>Specific guidance from IAAC states that CNC is responsible for: Step 5: Assess level of the impact a. Establish clear criteria with input from the rights-holding Indigenous community on what constitutes a low, moderate, or high level of impact. (IAAC 2024).</p> <p>This was not completed with meaningful input from Flying Post (FPFN), Matachewan (MFN) of Mattagami First Nations (MAFN)</p> <p>The iterative process of identifying guiding values and topics to inform the identification of pathways of impacts was not adequately discharged to include the perspective of Matachewan, Flying Post and Mattagami First Nations for several key components of the Impact Statement, nor were members adequately included in the</p> |

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| | | | <p>assessment of potential rights impacts, the nations were shown the impact characterization tables after they had already been determined and evaluated. While some suggestions about alterations to the project physical activities were considered and suggestions for mitigations from CNC form part of a comprehensive review of potential strategies, it remains that the tables were pre-determined by consultant company and CNC to be shown to the Nations for comment after the decisions have been made.</p> <p>Step 6: Dialogue on measures to address impacts</p> <p>a. For impacts that are likely to occur, ensure that an iterative two-way dialogue takes place on measures proposed to address the impact. (IAAC 2024)</p> <p>Additionally, while CNC has committed to maintain ongoing dialogue with the communities about measures to address impacts, mitigation actions shown in the Engagement Outcomes for Flying Post, Matachewan and Mattagami First Nations do not capture the spectrum of possible interventions that exist for health and socio-economic impact considerations. Example: off-site impacts, RSA considerations.</p> |
| Table 27.2 | Potential Effects, Effect Pathways, and Measurable Parameters for Indigenous Interests | | <p>Representative Potential Effects do not characterize the socio-economic components of the project on Indigenous rights and interests, despite this being a measurable effect pathway. While GBA+ and Indigenous impacts are considered in other areas of the Impact Statement, the rights assessment and analysis does not adequately integrate socio-economic impacts into the ‘Assessment of Potential Effects on Flying Post First Nations, Matachewan First Nations and Mattagami First Nations Interests’</p> <p>Reject the response that FN’s were given an opportunity to form their own socio-economic studies, CNC has a responsibility to account for</p> |

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| | | | <p>their project impacts from a project outlook standpoint. The new IAA 2019 legislation has introduced new pathways in IA and it's the developer that has the responsibility and the burden of proof to demonstrate rights impacts (or lack thereof) based on IAAC guidance. To add to this argument, there are numerous communities that are intermixed in the surrounding communities, and Indigenous peoples who are affiliated with other nations that are within Treaty 9 territory and have virtually no representation throughout the project planning.</p> <p>Effects pathways and parameters of measurement is underdeveloped and incomplete to reflect community concerns. Clearly the nations have concerns that were clearly stated in the community profiles and summary of engagement of Matachewan, Flying Post and Mattagami nations specifically outlines social, health and economic determinants. The effects are characterized later in the document but they are not integrated into the effects assessment wholistically.</p> <p>To fail to do so effectually limits the scope of impacts to rights assessment and sets up communities to have gaps in ongoing monitoring and evaluation opportunities through the regulatory process.</p> |
| 27.1.6.2 | Temporal Boundaries | | How has Seven Generations thinking been utilized to shape the temporal boundaries? It has not been applied to cumulative effects assessment either. |
| 27.1.10 | Significance of Adverse Federal Effects Characterization | | Though being eligible, health, social and economic impacts are not characterized within the chapter nor are human rights assessment instruments utilized, particularly in the context of project impacts being unable to contribute meaningfully to a large majority of the Indigenous populations of Flying Post, Mattagami and Matachewan First Nations. |

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| | | | Each nation expressed a range of socio-economic and health impacts from the project. |
| Table 27.4 | Project Interactions with Indigenous Interests | Monitoring and Maintenance | <i>There are no expected effects to any of the project effects pathways – Disagree, project activities could arguably affect Indigenous governance, health and economic priorities over time.</i> |
| 27.4.1.3 | Project Residual Effects | *The correction was made to update the residual effects to mention the project takes place over Treaty 9 lands. | <p>Mining Operations are a significant industry represented in rural northern Ontario, with thousands of mineral staking claims and exploration projects occurring across the north. Historical trends of minimal state intervention in prospecting and early exploration and development have affirmed the prioritization of mineral interests over other interests, including surface rights owners and Indigenous peoples (Theriault, S. 2013). Free-entry mining systems provide the rights for a miner to stake a claim to secure exclusive access to tracts of land to research publicly owned minerals, and these claims may be renewed should the claimant do the minimum required work under regulatory parameters (Theriault, S. 2013). The dispossession of Indigenous lands is facilitated through the institutionalization of sub-surface property rights and is predicated on the erasure of Indigenous claims to lands (Hoogeveen, D. 2014). The Mining Act in Ontario is being challenged as infringing on First Nations rights by awarding mining claims without consultation by seven different First Nations, currently in progress (King, R. 2024).</p> <p>It is crucial to provide a wider policy and historical explanation of the systematic erosion of Indigenous rights and access to lands and resources in Treaty 9, a project of the magnitude of Crawford Nickel should be calculated by impacts to Treaty 9 correctly, and include a percentage estimation of impact of Wabun Tribal area of representation, and additionally the traditional land areas spatially of Mattagami First Nation, and Matachewan and Flying Post First Nations as applicable.</p> |

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| Table 27.5 | Project Residual Effects on Indigenous Interests | Change to Indigenous governance, health, social and economic conditions | Move magnitude rating from Low to moderate. Incorporate residual effects to Indigenous and Treaty rights to a timing of long-term in duration as the landscape will be permanently altered from it's previous state, and it account better for the eventual economic decline that will be experienced by FN's participating in CNCs workforce. (Seven Generations thinking) |
| 27.4.4.3 | Disproportionately Distributed Residual Effects on Indigenous Sub-groups | <p>Regarding shortage of daycare services and infrastructure – acquisition of childcare to participate in the labour force</p> <p>Regarding lone parent households and disproportionate impacts on Indigenous women and gender diverse peoples outlined in Health Impacts Chapter findings</p> | <p>Suggest the following additions to the mitigation strategies</p> <p>-CNC will apply and enforce a robust recruitment and retention strategy that is informed by its policies, practices and workplace culture priorities.</p> <p>Goal 1 (Hiring): To develop and provide attractive job/career opportunities for Indigenous peoples that provides equitable access, which includes identifying and mitigating barriers to employment and supporting time off for cultural events.</p> <p>Objective 1: Socio-economic/ Health impact assessment findings are considered in employment packages for Crawford Nickel Project and other future CNC projects; Employment packages will include distinctions for marginalized or disadvantaged sub-groups, special considerations for childcare for Indigenous women - single income households (stipend/ wage increase to address gaps); Competitive employee packages that offer phased rotational work entry/ probationary periods of adjustment and acclimation; Training programs offered focused on employee rights/ reporting channels/ expectations and 'work readiness' training (seminars/ external partners/ community initiatives); Placements/ Internships will be dedicated to Indigenous community members to train for skilled labor on-site, job placements will lead to full-time employment should candidates successfully graduate from their internships</p> |

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| | | | <p>Goal 2 (Retention): To create a workplace that retains and supports Indigenous employees in achieving their long-term career goals.</p> <p>Objective 1: Generating a robust employee skills development program that applies latest recommendations from MiHR and other relevant sources/ publications; Upgrading/ Trades Program funding including dollar allocations and forecasted expenditures over project lifecycle; Scholarship programs implemented for off-site mitigations and peripheral services such as health and safety/ environmental monitoring and reclamation</p> <p>Objective 2: To exceed current Canadian mining standards of retention rates for Indigenous employees; Focus on employee health and well being/ satisfaction via semi regular updates; Code of Conduct and policy agreements extend to contractors and other businesses on site (catering, cleaning, maintenance, etc); Trauma-Informed practices are implemented where possible/ appropriate Work-readiness training includes specific realities of rotational work/ suite of services and programs made visible and available to staff on a regular basis</p> <p>Objective 3: Implement priority of interview with outstanding Indigenous staff for career advancement opportunities -Annual performance reviews to determine strengths and aptitudes/ assess ongoing issues related to work functions and daily operations Headhunting for talent within the company – identify skilled workers and set them up for success and advancement</p> <p>Goal 3 (Recruitment): To attract underrepresented groups to job opportunities within Industry, specifically focusing on women+ and Indigenous women</p> <p>Objective1: Surpass the mining Standard of 10.1% of (total women) and 1.7% Indigenous women – CNC will strive to achieve a minimum</p> |
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| | | | <p>of 15% women staff and 4% Indigenous women on staff proportional to the total overall number of employees employed by CNC where possible. CNC has committed to coordinate logistically with training institutions, accompany this commitment by generating apprenticeships where possible and generate annual jobs placements (Target numbers can change over the life cycle of the mine – numbers phased by construction, operation through to decommission); Identify and Elevate Indigenous role models in industry with appropriate compensation for outreach and support of company initiatives; Headhunt for skilled workers via networking, advertising campaigns and competitive and attractive employee packages</p> <p>Objective 2: To have a \$0 pay gap between all employees, notably for Indigenous employees to non-Indigenous employees/ Indigenous men to Indigenous women/ Indigenous women to non-Indigenous women; Bargaining packages will be specifically modified to extend additional supports to Indigenous employees, including but not limited to: scaled wage negotiations that favour specific sub-groups/ first right of application for promotional opportunities/ market stats and other employee benefits opportunities communicated to impacted Nations; Apprenticeship opportunities offered to employees to give them opportunities to access certification/ tickets and professional development over their tenure (training as conditions of employment for x amount of years)</p> <p>To develop and support career pathways and promotion opportunities for Indigenous employees that strive for 15% fill of Indigenous workers in senior leadership positions.</p> |
| 27.4.4.3 | Disproportionately Distributed Residual Effects on Indigenous Subgroups | Regarding disproportionate rates of violence experienced by Indigenous women and 2SLGBTQIA peoples | Recommend implementing tracking and reporting on actions taken by CNC to monitor the off-site activities of a large workforce in community, could include partnerships with local police, health centers to identify perpetrators that are creating problems and committing crimes in community. CNC maintains it's professionalism |

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| | | | and ethics mandate in both workplace and private spheres. Consider making conditions of employment contingent on not incurring violent crime related charges while working for the company. |
| 27. | | <i>‘Lighting sources from construction and operation will include stationary and mobile lighting sources that may cause some increased lighting outside the PA. There are few light sensitive receptors in the Atmospheric Environment LSA, and they area well removed from the Project with intervening forested areas that will obstruct Project lighting. Thus, no substantive adverse impacts from the Project light trespass area expected to influence the quality of experience or require conditions that are connected to the exercise of Indigenous Nations Indigenous and Treaty Rights within the Indigenous Interests LSA.’</i> | Was 7 Generational Forward Thinking considered here? What about future land use as community memberships continue to grow? Was the AWS 10-year plan considered here? Is this forested area protected from future harvest? |
| 27. | | Carbon Sequestration | Is there an opportunity for the First Nations to learn more about this and reviewed by third party? How is a carbon sink offsetting GHG impacts? |

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| 27. | | <p><i>'Wildlife species of cultural importance are present in the LSA. Direct loss of habitat (20%) will occur within the PA during construction but will be reversible through progressive reclamation which will be initiated in Year 7 to restore habitat lost within the PA by incorporating biodiversity-focused strategies. This process aims to create more suitable habitats for various wildlife species, including amphibians, reptiles, moose, bats, and boreal caribou, eventually resulting in a landscape that is more consistent with the natural habitats of the Wildlife and Wildlife Habitat LSA. Progressive reclamation during the operations phase is predicted to have a positive change in habitat, allowing wildlife to return to the area.'</i></p> | <p>Were the community's part of the biodiversity-focused strategies to incorporate ATK or strategies that would better suit the Nations? Will CNC be held accountable for activities in Year 7, regardless of project advancement?</p> <p>Does CNC have a Wildlife Management Plan – if the goal is to have wildlife return during operations, fences, etc. should be considered to avoid wildlife death – consider implementing an adaptive management plan to address this</p> <p>“CNC will engage the Nations” – CNC made a previous commitment to work with the First Nations on baseline/monitoring studies to incorporate ATK but was never done.</p> |
| 27.5.2.3 | Cumulative Effects | The project occurs in an area that has been altered by ongoing anthropogenic | Proposed project is developing on a greenfield site, overlays over wetlands and waterbodies and is expected to be one of the largest |

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| | | disturbance including forestry, mining, facilities, agriculture and linear development including roads and transmission line corridors. | nickel development sites in the world. Cumulative effects considerations are extremely important. Reversible effects/impacts: this cannot be certain, especially in terms of FN culture and way of life, no specific risk assessment instruments and or specific parameters attributed to ongoing monitoring programs have been outlined in the impact statement |
| 27. | Residual Cumulative Effects Characterization | The ratings given for “With the Project” and “Without the Project” are the same. | The magnitude of Crawford’s footprint and anticipated impacts on traditional and treaty rights, based on community feedback, does not align with Stantec’s weighing of effects. |
| 27.4.4.3 | Disproportionately Distributed Residual Effects on Indigenous Subgroups | Regarding policy developments that would uphold positive community relations and implement targeted programs that address socio-economic disparities *The listed suggestion for policy expansions are in 22.4.2.2 comment above | The childcare limitations are currently not listed or addressed in CNC’s proposed mitigation measures in Tables 27.1, 27.2, 27.3 Therefore, we propose the following modifications to the proposed mitigation tables, to be nested within the appropriate category of impact, as there are interconnected positive impacts these measures would support, the policy expansion has been suggested in earlier parts of the comments, and can include specific, measurable targets such as: <i>Goal 1 (Policy Innovation):</i> To revise and audit all existing policies, to expand and align them with EDI, MMIWG, CSR’s and GBA+ considerations where appropriate and feasible Objective 1: Complete review of policies and procedures with gap analysis and recommendations report completed <i>CNC policies will undergo systematic review to determine opportunities for modification alteration and expansion of policy parameters; Analysis recommendations will reflect EDI, MMIWG, CSR’s and GBA+ considerations, highlighting specific reporting opportunities</i> |

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| | | | <p>Objective 2: Update corporate policies and procedures to reflect gap analysis and Indigenous community recommendations <i>Policy responds to Indigenous interests and concerns via validation mechanisms and considers consultation outcomes and how they are reflected in CNC policies; Policy review is approved and implemented before construction begins on Crawford Nickel project</i></p> <p>Objective 3: To have a safe and inclusive work environment, including zero-tolerance policies related to cultural awareness, anti-harassment/anti-racism, and 2SLGBTQIA+ <i>Policies are linked back to gender responsive literature; Monitoring of recruitment and retention strategies to maintain reflexivity to workers issues; Ongoing oversight and programs (KPI's/ observances/ resourcing supports/ workplace culture upheld by foremen/ managers/ executive staff)</i></p> <p>Goal 2 (<i>Strategic Planning</i>): To synthesize and implement this Indigenous policy with wider corporate policy structure and practices where feasible and appropriate</p> <p>Objective 1: Incorporate policy considerations from project planning outset: <i>Planning for security into project construction (surveillance/ lighting/ keycards); Visual mediums representing FN's in the region (e.g. murals/ signage/ posters); Consensus models adopted into working groups/ monitoring committees</i></p> |
| Attachment 27.1, 27.2, 27.3 | Flying Post, Matachewan and Mattagami First Nations Engagement Outcomes for the | <i>'Canada Nickel will prepare plans, programs and policies to encourage contracting and procurement opportunities for Indigenous businesses.</i> | <p>Recommendations for construction related contracts and procurement strategy:</p> <p>CNC has committed to support business that is mutually beneficial by offering preferential procurement initiatives and capacity support for supply chain networks, partners will be indigenous businesses or</p> |

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| | <p>Crawford Nickel Project</p> | <p><i>Such plans will include the enhancement of supplier network development initiatives, including keeping a repository of local and Indigenous suppliers with potential to bid on the Project. Indigenous Nations located near the Project will be directly contacted regarding procurement opportunities from Canada Nickel and Canada Nickel will accommodate barriers there may be to bid on a contract (such as translation services), where feasible.'</i></p> | <p>have strong support for Indigenous peoples. CNC will help grow indigenous entrepreneurial activity via mentorship and support of the overall business community including enhancement and growth of business development support and other internal mechanisms.</p> <p><i>Goal 1: (Business development): CNC will assist Indigenous businesses, with a priority focus on (1) local, (2) regional/EV+, (3) national, North American Indigenous owned companies.</i></p> <p>Objective 1: Work with Nations to identify: Ready business opportunities; Short-term business needs; Long-term business supports</p> <p>Identify and consider barriers to Indigenous procurement in policies and processes (administrative burdens, RFP complexity, finding RFP's and making bids, Payment Terms and ROI, prerequisites)</p> <p>Prepare a summary report with 'horizon scan' results, showing business readiness deficits and opportunities - engage with regional reps/ prepare supply chain data - direct supply contracts/ subcontracts and partnerships/ RFP's</p> <p>Provide liaison and ongoing advisory supports for businesses preparing to service CNC projects</p> <p>Develop a roadmap for Indigenous communities/ entrepreneurs to engage in procurement</p> <p><i>Goal 2 (Accountability): Adopt procurement policies that support Indigenous business participation</i></p> <p>Objective 1: Requests For Proposals will include robust metrics to evaluate potential partners on their ability to support CNCs</p> <p>Indigenous relationships and policy mandates</p> <p>Metrics will align with CNC shared values and work to address socio-economic impacts to the local region of operational activities</p> <p>Scoring will be expanded to include 10% weight towards Indigenous participation for 100% of all contract bids (Indigenous working hours/ Indigenous ownership/ the extent of Indigenous Persons training and</p> |
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| | | | <p>development; including scholarships, apprenticeships, or skills training for all awarded contracts), and include ESG score carding.</p> <p><i>Objective 3: Maintain accountability with all business relationships CNC audits at all stages of procurement process: Proposal; Evaluation; Contract Stage; Project Completion</i> Require an audit of all Joint Venture and partnership programs: Audits aim to assist in addressing ‘paper joint ventures’ where CNC ensures benefits are actually flowing to Indigenous peoples.</p> <p><i>Goal 3 (Investment): CNC will allot a minimum of 10% set-asides of business contracts or more to Indigenous owned businesses and contractors - aim to increase to 15% during operations phase of project</i></p> <p>Objective 1: Assess spend targets and involvement of Indigenous businesses in supply chain; Assess involvement of Indigenous business potential in supply chain and project needs; Set practical Indigenous spend targets, focused on scaled integration with ‘work-up’ goals Focus on scaled integration over Crawford Nickel life cycle, significant allocations made in construction for short-term work undertaken, longer term contracts awarded to Indigenous servicers and contractors Temporary contracts will be awarded to non-Indigenous businesses with scale-up plan and start date determined for contract awards to Indigenous owned businesses</p> <p>Objective 2: Establish Bid Value Reductions (BVRs), set-asides and closed competitions for Indigenous businesses: BVR policy developed by CNC for First Nations procurement; Set-asides percentage will be maintained at 10% - including Indigenous SMEs.; Closed competitions will be offered if there are several Indigenous owned business available to bid on a contract;</p> |
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| | | | <p>Invitationals and direct awards considered for locally impacted Indigenous communities.</p> <p>Where possible and appropriate, measures should be made publicly available and adopted as a strategic initiative by CNC leadership, to enforce a workplace culture of economic reconciliation and relations making with impacted First Nations communities. At all possible opportunities, CNC will make an effort to set an example and maintain commitments to First Nations and supply chains in the region. Should specific elements be incorporated into Impact and Benefit Agreements, CNC will publish practices that are non-confidential and can serve to set a positive precedent for other developers.</p> |
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Chapter 34: Follow Up Programs and Adaptive Management:

Passages of interest/ relevance:

34.1.2 ‘Follow-up programs will be developed and implemented in accordance with the conditions of approval anticipated in the Decision Statement to be issued under the Impact Assessment Act 2019 for this project’

| Section | Reference | Excerpts/ Notes | Comment |
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| 34.1.3 | Adaptive Management | <i>‘While specific adaptive management measures are not identifiable at this point, an adaptive management strategy has been developed that integrates adaptive management into the follow-up programs, while decisions to adopt specific adaptive management</i> | <p><i>‘Adaptive Management Plans are considered necessary in addition to follow-up programs if it meets each of the following criteria: there is high uncertainty around the effectiveness of mitigation measures or predicted effects; there is a need for, or benefit to, reducing uncertainties through an Adaptive Management Plan; adaptive management is technically feasible’</i></p> <p>No adaptive management plans are proposed, instead integrated into follow-up programs. Disagree, there are numerous opportunities to integrate social and health impacts indicators into ongoing reporting requirements to the agency.</p> |

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| | | <i>measures will be identified later during the implementation of the follow-up programs as a result of the analysis of data generated during construction, operations and/or decommissioning and closure of the project'</i> | Could include policing statistics, grievance mechanisms and reporting procedural implementation |
| 34.2 | Proposed Follow Up Programs | <p><i>'Targeted follow-up programs are not anticipated to be required for Light, Climate Change, Health, Social Conditions, Economic Conditions, and Indigenous Interests; rationale is provided in the relevant subsections below.'</i></p> <p><i>'Canada Nickel will engage with relevant regulatory authorities and Indigenous nations in the design and implementation of the follow-up programs, and evaluation of follow-up results and subsequent updates to the program. Canada Nickel will further engage potentially affected Indigenous nations for participation in various monitoring programs on a</i></p> | <p>The Crown plays a critical role in the control of natural resources, including ways in which they are accessed and produced via formal institutional frameworks (Bourgeois, S.; Zema, A.C. 2024) such as the Impact Assessment Act 2019. The regulatory process presently may include conditions in a decision statement that are issued by Ministry of Environment and Climate Change in which proponents of a designated project must comply, including mitigation measures and follow-up program requirements (IAAC, 2025). The legal definition of what should be considered within the conditions is rather vague but distinctly outlines how they must be within federal authority to exercise and that is it to the ministers discretion and consideration of what appropriate conditions may be applied (Government of Canada 2025). It also states that factors to be considered in determinations consider the impact a project may have on Indigenous groups that are recognized and affirmed by the Constitution Act 1982 (Government of Canada 2025).</p> <p>Critically important to IA processes is the directive of Indigenous rights considerations, and to include implementing the IAA 2019 in a way that aligns with the UN Declaration, including 'consideration of health, social and economic factors, including impacts to women, youth and elders' (Government of Canada 2023). While leaving space for a broader opportunity to address systemic and structural impacts of development, it also creates more nuance to the legal requirements, and to stakeholder interactions and results during the impact assessment process, creating a</p> |

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| | | <p><i>go-forward basis, where appropriate. Opportunities for the involvement of potentially affected Indigenous nations in the follow-up program design and implementation will be considered under the context of Impact Benefit Agreement(s) or Mutual Support Agreement(s) with potentially affected First Nations (refer to Section 2.1.5, Chapter 2 of the Impact Statement).'</i></p> | <p>mismatch of capacity for inclusion and commitment to implementation of findings (Darling, S. et al. 2023).</p> <p>For example, are we thinking of rights impacts in terms of human rights? Indigenous rights? How are we taking inventory of what mitigation strategies may be attributed to offsetting direct project impacts vs offsetting indirect exacerbation of existing socio-economic issues? This complicated landscape is important in guiding discussions on what should be part of assessments, particularly if the implementation of a mitigation strategy would offset impacts to Indigenous women living outside of their traditional territories, as well as women and 2SLGBTQQIA+ peoples generally, it should be included within the assessment process and coupled with more integrated and collaborative approaches that share the responsibilities between stakeholders.</p> <p>It's important to reflect on the issue of what constitutes 'best practices' in applying (CR)GBA+ in project planning in the context of addressing MMIWG and Indigenous women's priorities, including what types of actions and solutions are emerging from regulatory processes, and whom they are truly reaching. There is typically a list of consulted Indigenous communities that are categorized under their level of interest or impact by the proposed project, with First Nations whose Treaty and land rights would be infringed upon are rightfully centered in consultations. Impacted First Nations whose rights would be infringed upon by the proposed development are included in opportunities for participation and co-development in baseline studies as well as impacts and mitigation strategies developed by the proponent.</p> <p>There is unclear determination of how GBA+ would be informed by specific studies undertaken by the proponent, nor indication of risk assessment instruments, nor concrete commitments beyond the identification of potential positive and negative consequences, even for rights impacted communities. There is also the question of who is involved in shaping studies, and how wider impacts to Indigenous women in urban areas are</p> |
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| | | | <p>captured in the Impact Statement. There are Indigenous women who travel to urban areas from remote communities and may be outside of their Treaty area, with no representation in IA consultations, yet still experience the negative impacts of development. Furthermore, Indigenous women who are experiencing Treaty infringement and are living in or near their home communities and have no wish to work in resource development are largely ignored within the IA context beyond being identified as a sub-group that ‘may experience increased risk’.</p> <p>There remain good opportunities in ongoing monitoring and adaptive management programs that cannot be overlooked for their importance, particularly in the context of navigating interventions and mitigation strategies that have uncertain predictability in their success.</p> <p>The dynamic of Crown influence over resource development impacts as currently presenting in IA outcomes reinforces the rationale for negotiations and benefit sharing, such as Impact and Benefit Agreements (Bourgeois, S.; Zema, A. 2024). Stakeholders are leaning on neo-liberal market-based solutions such as Impact and Benefit Agreements (IBAs) to reflexively address nuanced and complex socio-economic issues that are arguably within the sphere of government policy and infrastructure investments to address and enforce, this is especially apparent when considering the cumulative impacts of resource development in the rural north and in remote resource generating communities in Crawford Nickel Project’s RSA.</p> <p>Beyond equity and implementation questions about IBA’s for First Nations, the mitigation of complex socio-economic issues including monitoring and incident reporting mechanisms, if rested within Industry-Community agreements are not public facing. Therefore, we cannot learn about their outcomes, we cannot monitor to understand the development of processes and their outcomes for communities and expand best practices across the mining sector. Development proponents tend to akin the term ‘participation’ to a relationship with ‘beneficiaries’ that are involved in</p> |
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| | | | <p>project planning to secure the social license to operate and increase legitimacy and acceptance of the project (Fletcher, 2019). By applying practices and principles of gender transformative change while doing (CR)GBA+ in assessments, there is great potential to apply to wider impact mitigation strategies for diverse sub-groups to benefit from rather than simply ‘rights holders’ (i.e. IBA or MOU holders) and often these mitigation strategies offer benefits that can also positively impact settler and immigrant women and gender diverse peoples working at or living near project sites.</p> <p>Recommend that monitoring programs be developed for social conditions under aspects under the feasible control of CNC, hiring and employment statistics and practices, policy making and implementation. Procurement and business acquisitions. Communities should co-determine areas of high interest and develop monitoring indicators collaboratively, within the Impact Assessment at every available opportunity.</p> |
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Appendix E: Summary of Project Commitments

| Section | Reference | Excerpts/ Notes | Comment |
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| E.2 | Summary of Follow-Up Programs | VC Follow up program/ follow up program components | No socio-economic monitoring program, no cumulative effects monitoring program- how is CNC taking the predicted negative impacts to marginalized sub-groups seriously? How are complementary measures being sought to alleviate administrative burdens on other stakeholders and impacted groups? |

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