

## Enclosure 1: Provincial Advice Record – Crawford Nickel Project Impact Statement

Please submit the completed form by **January 24, 2025**, via the Registry.<sup>1</sup>

### Ministry or Organization Contact Information

<b>Submission Date</b>	January 23, 2025
<b>Ministry/Organization</b>	Ministry of the Environment, Conservation and Parks, Drinking Water and Environmental Compliance Division, Timmins District Office
<b>Lead Contact, Title, Work Unit</b>	Sarah King, Environmental Compliance Officer
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Please see questions and guidance in Tables 1, 2 and 3 attached.

Sarah King

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**Name of Ministry / Organization  
Responder**

Environmental Compliance Officer,  
Timmins District Office

\_\_\_\_\_  
**Title of Responder**

23 January 2025

\_\_\_\_\_  
**Date**

<sup>1</sup> All comments should be submitted via the **Submit a Comment** feature available on the Project's Canadian Impact Assessment Registry page (Reference 83857). Letters and forms can be uploaded using this feature. If you have any difficulties submitting this way, please contact IAAC at [Crawford@iaac-aeic.gc.ca](mailto:Crawford@iaac-aeic.gc.ca) for assistance.

**Table 1. Views to Inform the Impact Assessment**

Table 1 can be used to provide views for IAAC's consideration in the analysis of the Project's federal effects<sup>2,3,4</sup> and preparation of the Impact Assessment Report, considering your ministry's local knowledge and regulatory expertise. Reviewers should consider project context and are encouraged to provide solution-oriented advice even where potential gaps in information are observed.

Comment ID	Reference to Impact Statement	Views to Inform the Impact Assessment
<p><i>Please identify comments by ministry and number.</i> <i>e.g.: MNR-01</i></p>	<p><i>Identify the specific section of the Impact Statement to which your comment applies.</i></p>	<p><i>Provide views and information for IAAC's consideration in the analysis of adverse federal effects, such as</i></p> <ul style="list-style-type: none"> <li><i>• whether the information is technically appropriate to support the conclusions presented, and the proposed mitigation measures are suitable to manage effects, considering regional context;</i></li> <li><i>• sources of uncertainty in the proponent's analysis that may substantially weaken conclusions, if any;</i></li> <li><i>• suggestions for provincial operational guidance or standards, including other mitigation and monitoring measures, that are well understood to be effective in the region;</i></li> <li><i>• relevant provincial legislative frameworks such as licensing, permitting, policies or programs that may provide another means to address adverse effects (describe the environmental outcomes that are typically achieved by the frameworks, how they are achieved, and whether mitigation and monitoring may be required and enforced); and</i></li> <li><i>• if your ministry has identified any permit or approval that it may not be able to issue to allow the Project to proceed as currently planned, and next steps for resolution of any issues.</i></li> </ul>
<p>MECP-TDO-01</p>	<p>3.3.7.1 Project Description - Sewage Treatment  22.2.2.2 Social Conditions - Utilities</p>	<p>The Project Description includes the collection of sewage in storage tanks (for offsite disposal) as an option for domestic sewage management. The use of holding tanks is not included as an option in the alternatives assessment (5.3.10.1), so it's not clear if it is in serious consideration, either as a short-term or long-term option.</p> <p>This approach to managing domestic sewage is discouraged. Similar projects in our area have encountered ongoing problems using domestic sewage storage tanks, such as stored wastewater becoming septic and difficult to treat. The proponent may also encounter difficulties disposing of stored wastewater offsite, as some local municipal WWTPs have had plant upsets caused by accepting septic wastewater from similar projects. In addition, local sewage dewatering trenches are operating at or near capacity, so the proponent may have to consider shipping sewage to other areas in the province.</p>
<p>MECP-TDO-02</p>	<p>5.3.10.1 Alternatives Assessment - Domestic Sewage Waste</p>	<p>The proponent has identified two options for on-site domestic sewage treatment: a sewage treatment plant or septic systems. Both alternatives would involve disposal of sludge. Local sewage sludge dewatering facilities are operating at or near capacity, so the proponent may need to consider shipping sewage to other areas in the province.</p> <p>A drawback of the sewage treatment plant option that is not mentioned in the Alternatives Assessment is the possibility of sewage spills or leaks, which can be an issue for above ground piping to package wastewater treatment plants for domestic sewage treatment.</p>
<p>MECP-TDO-03</p>	<p>5.3.11.1 Alternatives Assessment - Domestic and Industrial Waste  22.2.2.2 Social Conditions - Utilities  22.4.1.1 Social Conditions - Services and Infrastructure</p>	<p>The proponent identified offsite disposal at existing facilities as the only feasible option for domestic and industrial waste disposal. The impact assessment does not include an estimation of the amount of waste that would be generated throughout the project's lifespan (construction, operation and demolition), or a comparison to the remaining capacity of the existing facilities in consideration. Without this information, it is not possible to assess the feasibility of using existing facilities or properly compare it to the alternatives. Most of the existing landfills in the area are small and may be reluctant to accept large amounts of non-residential domestic waste.</p>

*Please insert additional rows as necessary.*

<sup>2</sup> “Federal effects” for this purpose means adverse effects within federal jurisdiction and adverse effects that are direct or incidental to the exercise of a federal power, duty or function (as defined in section 2 of the *Impact Assessment Act*).

<sup>3</sup> IAAC also invites views on effects related to public interest factors (defined in section 63 of the *Impact Assessment Act*) that may inform decision-making, such as positive effects on local economic conditions that contribute to sustainability.

<sup>4</sup> IAAC also invites views on potential effects to species at risk, and how they are typically managed in the region, to inform IAAC's obligations under section 79 of the *Species at Risk Act*.

**Table 3. Advice to the Proponent to Support Regulatory Efficiency**

Table 3 can be used to inform future or concurrent provincial regulatory processes for the Project, to support regulatory efficiency.

Advice ID	Reference to Impact Statement	Provincial Permit or Licence	Advice to the Proponent to Support Permitting Efficiency
<i>Please identify advice by ministry and number. e.g.: MNR-03</i>	<i>Identify the section of the Impact Statement to which your comment applies.</i>	<i>List the potential approval or relevant legislative framework</i>	<ul style="list-style-type: none"> <li>• Describe information needed to determine if the provincial approval is required.</li> <li>• Identify if the Impact Statement could be sufficient to complete the permitting process. If not, briefly describe what is needed next.</li> <li>• Advise how the Proponent can coordinate regulatory requirements with the remainder of the impact assessment process to streamline approvals.</li> <li>• Describe environmental outcomes of the regulatory framework and how they are achieved such as regulations or enforceable conditions.</li> <li>• Identify any permit or approval that your ministry may not be able to issue to allow the Project to proceed as currently planned, and next steps to resolve issues.</li> </ul>
MECP-TDO-04	3.3.7.1 Project Description - Sewage Treatment	Private, Commercial, Institutional (PCI) Sewage Environmental Compliance Approval (ECA)	Based on the size of the project and number of employees expected on site, the proponent will need a PCI Sewage Works ECA for either of the on-site domestic wastewater treatment methods (sewage treatment plant or septic systems). The requirements for the permitting process will depend on which sewage management method is chosen.
MECP-TDO-05	3.3.7.3 Project Description - Organic and Solid Waste	Waste Disposal Site ECA	The proponent is not planning to create an on-site landfill at this point. If an on-site landfill is required, the proponent would need a Waste Disposal Site ECA.
MECP-TDO-06	3.8.1 Project Description - Atmospheric Emissions	Air Emissions ECA	The proponent will need an Air Emissions ECA under section 9 of the Environmental Protection Act.
MECP-TDO-07	Appendix J Site-Wide Water Management Plan	Industrial Sewage Works (ISW) ECA	The proponent will need an ISW ECA for the works involved in the collection, transmission, treatment and disposal of industrial sewage (e.g. contact water).
MECP-TDO-08	Appendix J Site-Wide Water Management Plan	Permit to Take Water (PTTW)	The proponent will need PTTWs for water takings greater than 50,000 litres per day as described in O. Reg. 387/04 WATER TAKING AND TRANSFER.

*Please insert additional rows as necessary.*