

Enclosure 1: Provincial Authority Advice Record - Crawford Nickel Project

Please submit the completed form by **February 2, 2026**, to Crawford@iaac-aeic.gc.ca.

Department Contact Information

Submission Date	February 12, 2026
Ministry	Ministry of the Environment, Conservation and Parks
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1. Review the assigned proponent responses to IAAC's comments on the Impact Statement and provide views for IAAC's consideration in the analysis of the project's effects and preparation of the Impact Assessment Report (in Table 1). Also using Table 1, provide an answer to each of IAAC's targeted questions outlined in Table 2 that is assigned to your ministry.

Laura Maharaj

Name of Ministry Responder

Hydrogeologist

Title of Responder

February 12, 2026

Date

Table 1. Advice to Inform the Impact Assessment

Table 1 should be used to provide views for IAAC’s consideration in the analysis of the project’s effects¹ and preparation of the Impact Assessment Report and potential conditions. Reviewers should consider project and regulatory context and provide risk-proportional, solution-oriented advice that allows the assessment to proceed to decision-making. Advice should include responses to, but not be constrained by, the targeted questions in Table 2.

Comment ID	Reference to IAAC’s Comment	Description of View or Concern Related to an Effect	Advice to Inform the Impact Assessment
<p>Please identify comments by organization and comment number. e.g.: IAAC-01</p>	<p>Identify the specific Comment ID associated with IAAC’s comments on the Impact Statement to which your comment applies. e.g.: FFH-01</p>	<p>Provide a brief description of the view or concern for IAAC’s consideration in the analysis of effects, based on available information, such as:</p> <ul style="list-style-type: none"> • a missing pathway of an adverse federal effect that may increase the overall extent of significance; • inaccurate characterization of an adverse residual effect; or • sources of uncertainty that, in your organization’s view, may weaken conclusions 	<p>Considering project and regulatory context, provide solution-oriented advice that allows the assessment to proceed to decision-making. For example:</p> <ul style="list-style-type: none"> • Characterize residual effects and associated uncertainty, as predicted by your organization, based on available information. Explain the uncertainty. Consider describing a range of possible effects scenarios. Consider qualitative descriptions of effects, if needed. • Suggest other mitigation and follow-up measures or adaptive management that may reduce predicted adverse federal effects, increase certainty in predictions, or help manage uncertainty, including operational guidance or standards, and well-understood practices. • Describe any other federal or provincial legislative frameworks, policies, programs, and potential complementary measures that may provide another means to address adverse federal effects, including predictable outcomes and whether other tools set conditions on the proponent. • Identify those mitigation measures and project design elements that are necessary to limit the extent of significance of adverse federal effects, and those follow-up program measures that address substantial uncertainty with the accuracy of predictions and the effectiveness of mitigation, in relation to key issues that are material to decision-making. • Provide advice on risk (likelihood and severity of effects), using applicable frameworks relevant to your mandate, to support IAAC’s risk-based decisions. <p>Based on current knowledge, IAAC does not intend to ask more questions of the proponent. If you are not able to respond to the specific prompts for advice outlined here and in Table 2, IAAC requests a discussion to better understand your views.</p>
<p>GW-01</p>	<p>TISG: Section 8.6</p>	<p>CNC’s groundwater model provides a reasonable watershed scale framework to assess potential changes in groundwater levels and discharge associated with mine dewatering; however, the steady-state formulation limits confidence in the timing, duration, and seasonal expression of groundwater–surface water interactions that are most relevant to fish habitat and Indigenous peoples.</p> <p>The model predicts long-term average conditions for fish habitats and Indigenous lands but is limited in its ability to assess fine-scale, smaller changes such as seasonal low-flow conditions, freeze-up, localized discharge areas and spring freshet timing.</p>	<p>IAAC should acknowledge the potential for adverse impacts from groundwater–surface water interactions particularly with respect to localized seasonal reductions at sensitive features important to fish life stages and Indigenous use, and areas where hydrostratigraphic continuity is uncertain (e.g., eskers or thin/absent clay windows).</p> <p>Risk is assessed as low to moderate in localized areas, but potentially moderate risk where groundwater-dependent habitats occur. Areas where groundwater-dependent habitats occur should have additional monitoring measures in place.</p> <p>IAAC should rely on the Ontario Water Resources Act (OWRA), Environmental Protection Act (EPA), the Lakes and Rivers Improvement Act (LRIA) and Fisheries Act permitting to refine predictions through enforceable monitoring, multi-staged triggers and contingency plans to manage uncertainty and prevent adverse effects.</p>

¹ “Effects” means adverse effects within federal jurisdiction and direct or incidental adverse effects (as defined in section 2 of the *Impact Assessment Act*).

			<p>IAAC should note that MECP regulates groundwater takings through Permits to Take Water (PTTWs) issued under the Ontario Water Resources Act, and similarly regulates the treatment and discharge of wastewater from dewatering activities (if necessary) through an Environmental Compliance Approvals (ECAs) issued under the Environmental Protection Act (EPA).</p> <p>Additional technical studies may be required to support the issuance of these permits and approvals. Based on the results, the MECP can tailor project-specific conditions for effects monitoring, reporting, and contingency actions to prevent and mitigate adverse effects of water takings and associated discharges.</p> <p>The MECP has the power to inspect and enforce compliance with the conditions of the PTTW's and ECA's associated with the project.</p>
GW-01(a)	IAAC Comment GW-01(a); Appendix C.4; IS Chapters 14–16	<p>CNC's baseflow calibration using a baseflow index (BFI) supports the conclusion that the North Driftwood River system is predominantly surface-water fed at the watershed scale; however, BFI represents catchment-scale averages and does not resolve localized groundwater-dependent features (e.g., springs, wetlands, seepage etc.).</p> <p>Small groundwater contributions can be functionally important for maintaining cold-water inputs, and wetland features, and for supporting habitats used by species of importance to Indigenous peoples.</p>	<p>MECP has moderate confidence in predictions of groundwater discharge effects at the watershed scale, but lower confidence in predicting responses of localized groundwater-dependent habitats relevant to fish and Indigenous peoples.</p> <p>Risk is assessed as low to moderate likelihood in localized areas, but potentially moderate risk where groundwater-dependent habitats occur. Areas where groundwater-dependent habitats occur may require additional monitoring measures in place.</p> <p>IAAC should rely on the Ontario Water Resources Act (OWRA), Environmental Protection Act (EPA), the Lakes and Rivers Improvement Act (LRIA) and Fisheries Act permitting to refine predictions through enforceable monitoring of groundwater levels, baseflow indicators, wetland extent, multi-staged triggers and contingency plans to manage uncertainty and prevent adverse effects to groundwater-dependent habitats.</p> <p>IAAC should note that MECP regulates groundwater takings through Permits to Take Water (PTTWs) issued under the Ontario Water Resources Act, and similarly regulates the treatment and discharge of wastewater from dewatering activities (if necessary) through an Environmental Compliance Approvals (ECAs) issued under the Environmental Protection Act (EPA).</p> <p>Additional technical studies to support the issuance of these permits and approvals may be required. Based on the results, the MECP can tailor project-specific conditions for effects monitoring, reporting, and contingency actions to prevent and mitigate adverse effects of water takings and associated discharges.</p> <p>The MECP has the power to inspect and enforce compliance with the conditions of the PTTW's and ECA's associated with the project.</p>
GW-01(b)	IAAC Comment GW-01(b); Appendix C.4 Sections 6–7	<p>CNC's approach links a steady-state regional groundwater model to the surface water quantity model in a one-way, hybrid framework, where baseflow magnitude is derived primarily from field-based estimates and the groundwater model is used to define spatial distribution and relative change.</p>	<p>The MECP has moderate uncertainty in the magnitude, spatial variability, and timing of localized flow responses. There are a range of outcomes from minimal change in average flows to localized small-scale deviations where groundwater contributions are concentrated and/or where dewatering drawdowns differ from predictions.</p> <p>To manage this uncertainty and reduce risk, IAAC should rely on the Ontario Water Resources Act (OWRA), Environmental Protection Act (EPA), the Lakes and Rivers Improvement Act (LRIA) and Fisheries Act permitting.</p>

		<p>This is a good approximation for the watershed scale; however, it limits confidence in predicting smaller feature-scale responses and introduces uncertainty in how pumping-related groundwater stresses may impact specific stream segments, wetlands, and lakes.</p> <p>The model lacks transient coupling and a formal sensitivity analysis, which is a source of uncertainty in predicting surface water changes.</p>	<p>IAAC should note that MECP regulates groundwater takings through Permits to Take Water (PTTWs) issued under the Ontario Water Resources Act, and similarly regulates the treatment and discharge of wastewater from dewatering activities (if necessary) through an Environmental Compliance Approvals (ECAs) issued under the Environmental Protection Act (EPA).</p> <p>Additional technical studies may be required to support the issuance of these permits and approvals. Based on the results, the MECP can tailor project-specific conditions for effects monitoring, reporting, and contingency actions to prevent and mitigate adverse effects of water takings and associated discharges. The MECP recommends including:</p> <ul style="list-style-type: none"> • Monitoring of groundwater levels and surface water flows/lake levels at representative control and impact locations selected to validate the GW→SW interactions. • Staged triggers tied to deviations from predicted flows/levels and groundwater responses. • Model verification and iterative updating at defined intervals. <p>The MECP has the power to inspect and enforce compliance with the conditions of these PTTW's and ECA's associated with the project.</p> <p>Risk is assessed as low to moderate for adverse outcomes at the watershed scale, with localized moderate risk where small-scale responses deviate from predictions; this risk is considered manageable with enforceable monitoring, triggers, contingency measures and adaptive operational controls included in permitting.</p>
<p>GW-01(c)</p>	<p>TISG: Section 8.6.1 IS: Appendix C.4</p>	<p>CNC's response indicates that major lakes and regional controls are represented as specified-head (constant head) boundaries and that the model domain extends beyond the predicted zone of influence. Additionally, the drawdown cone does not intersect with external boundaries.</p> <p>The external model boundaries mainly control regional head gradients, not local stream exchange, therefore baseflow/discharge patterns are governed by internal hydraulics, not by imposed external heads.</p> <p>CNC did not present a boundary a sensitivity analysis or flux budgets. There is moderate uncertainty about how much external boundaries influence predicted drawdown and baseflow under worst-case dewatering scenarios.</p>	<p>The predicted groundwater and surface water responses have low uncertainty at the watershed scale but subject to moderate uncertainty at the feature scale due to reliance on specified-head (constant-head) external boundaries and the absence of boundary sensitivity testing.</p> <p>The MECP considers the current modelling to be reasonable at the Impact Assessment stage and advises that remaining uncertainties can be appropriately addressed through targeted refinements and sensitivity analyses required as conditions in the provincial permitting.</p> <p>There are a range of outcomes, from minimal influence of distant boundaries to moderate impacts on drawdown and discharge patterns where hydraulic connectivity is stronger than assumed. To manage this uncertainty, IAAC should rely on Ontario Water Resources Act (OWRA), Environmental Protection Act (EPA), the Lakes and Rivers Improvement Act (LRIA) and Fisheries Act permitting.</p> <p>IAAC should note that the MECP regulates groundwater takings through Permits to Take Water (PTTWs) issued under the Ontario Water Resources Act. Additional technical studies may be required to support the issuance of these permits and approvals. Based on the results, the MECP can tailor project-specific conditions for effects monitoring, reporting, and contingency actions to prevent and mitigate adverse effects of water takings. The MECP recommends including a boundary sensitivity analysis, boundary flux calculations, model verification, iterative updating at defined intervals and water-balance reporting.</p>

<p>GW-01(d)</p>	<p>TISG: Section 8.6.1 IS: Appendix B.5, Appendix C.4</p>	<p>CNC’s multi-layer hydrostratigraphic model is conceptually consistent with regional geology and supported by drilling, hydraulic testing, and geophysical interpretation.</p> <p>CNC’s conceptual model assumes that a laterally continuous glaciolacustrine clay/till limits the interaction of surface water and the underlying glaciofluvial and bedrock aquifers across the Project Area. However, the presence of eskers, coarse glaciofluvial units, and areas of thin or absent clay represents potential preferential pathways for groundwater–surface interactions.</p> <p>There is moderate uncertainty regarding the lateral continuity of low-permeability units and the vertical hydraulic conductivity. Calibration is primarily head-based, with limited constraint on vertical gradients and layer-specific fluxes.</p>	<p>There is moderate uncertainty related to vertical connectivity and unit continuity that would benefit from targeted nested monitoring and sensitivity testing at the permitting stage. IAAC should rely on Ontario Water Resources Act (OWRA), Environmental Protection Act (EPA), the Lakes and Rivers Improvement Act (LRIA) and Fisheries Act permitting.</p> <p>IAAC should note that MECP regulates groundwater takings through Permits to Take Water (PTTWs) issued under the Ontario Water Resources Act, and similarly regulates the treatment and discharge of wastewater from dewatering activities (if necessary) through an Environmental Compliance Approvals (ECAs) issued under the Environmental Protection Act (EPA).</p> <p>Additional technical studies may be required to support the issuance of these permits and approvals. Based on the results, the Province can tailor project-specific conditions for effects monitoring, reporting, and contingency actions to prevent and mitigate adverse effects of water takings and associated discharges. The MECP recommends requesting investigations into eskers and thin-clay zones, including nested piezometers, layer-specific pumping/packer tests and thermal assessments (e.g., surface water temperature profiling) in areas of sensitive features to identify the lateral continuity of low-permeability units and potential preferential pathways. Results should be used for groundwater model verification and iterative updating at defined intervals.</p> <p>The MECP has the power to inspect and enforce compliance with the conditions of the PTTW’s and ECA’s associated with the project.</p>
<p>GW-01e</p>	<p>TISG: Section 8.6.1, Section 8.6.2 IS: Appendix B.5 – Section 5.5 & Section 5.6, Appendix C.4 – Section 6.5 & Section 8</p>	<p>CNC has analyzed the potential hydraulic role of the regional fault using a barrier versus conduit approach, which demonstrates the sensitivity of drawdown propagation and groundwater discharge patterns to fault behavior. While this approach bounds the range of possible responses, the sensitivity cases are scenario-based rather than calibrated, and do not resolve which hydraulic condition is most representative of field conditions or whether connectivity varies by depth. This introduces residual uncertainty in the magnitude, direction, and spatial distribution of groundwater flow and discharge under operational and closure conditions, which may impact localized predictions.</p>	<p>There is moderate uncertainty at the feature scale due to unresolved fault hydraulics. There is a range of outcomes, from minimal influence on regional gradients to preferential drawdown or discharge redistribution along the fault zone.</p> <p>As stated in the MECP groundwater comments dated January 23, 2025 “ <i>“It is recommended that additional hydraulic testing is competed across the regional fault in the PA as well as LSA and RSA to provide additional hydraulic conductivity data to support the EA conclusions that the main fault is not a preferential pathway for groundwater flow. It is a common knowledge that K values may vary by several orders of magnitude for the same formation and likely along different the different portions of the fault.”</i></p> <p>IAAC should note that MECP regulates groundwater takings through Permits to Take Water (PTTWs) issued under the Ontario Water Resources Act, and similarly regulates the treatment and discharge of wastewater from dewatering activities (if necessary) through an Environmental Compliance Approvals (ECAs) issued under the Environmental Protection Act (EPA).</p> <p>Additional technical studies may be required to support the issuance of these permits and approvals. Based on the results, the MECP can tailor project-specific conditions for effects monitoring, reporting, and contingency actions to prevent and mitigate adverse effects of water takings and associated discharges. The MECP recommends including additional monitoring wells (if required), additional hydraulic testing, and iterative groundwater model verification, as stated in the January 23, 2025, comment.</p>

			The MECP has the power to inspect and enforce compliance with the conditions of the PTTW's and ECA's associated with the project.
IP-01	<i>TISG: Section 8.7.2, Section 8.9.2, Section 8.10.2 IS: Chapter 16, Chapter 18, Chapter 19</i>	<p>The MECP has moderate confidence in the watershed scale assessment of predicted changes in groundwater and surface water levels; however, confidence is low to moderate in the ability of the assessment to predict localized habitat changes relevant to species of importance to Indigenous peoples (e.g., waterfowl, moose).</p> <p>There is uncertainty in how groundwater drawdown, mounding, and altered surface water levels may affect the natural functioning of the ecosystem, such as wetlands, riparian areas, and shallow open-water features, which limits confidence in predicting the spatial extent and timing of habitat change.</p>	<p>The MECP does not recommend additional information requests at the Impact Assessment stage, provided that uncertainty is transparently acknowledged and managed through federal and provincial permitting.</p> <p>IAAC should rely on Ontario Water Resources Act (OWRA), Environmental Protection Act (EPA), the Lakes and Rivers Improvement Act (LRIA) and Fisheries Act permitting to refine predictions and manage uncertainty.</p> <p>IAAC should note that MECP regulates groundwater takings through Permits to Take Water (PTTWs) issued under the Ontario Water Resources Act, and similarly regulates the treatment and discharge of wastewater from dewatering activities (if necessary) through an Environmental Compliance Approvals (ECAs) issued under the Environmental Protection Act (EPA).</p> <p>Additional technical studies may be required to support the issuance of these permits and approvals. Based on the results, the MECP can tailor project-specific conditions for effects monitoring, reporting, and contingency actions to prevent and mitigate adverse effects of water takings and associated discharges. The MECP recommends:</p> <ul style="list-style-type: none"> • verification and monitoring of groundwater levels, surface water levels, and wetland extent; • Indigenous-informed monitoring of key habitat features; and • adaptive management measures with enforceable triggers and response actions to address unanticipated habitat loss or alteration. <p>The MECP has the power to inspect and enforce compliance with the conditions of these legal permits, should they be issued.</p>

Please insert additional rows as necessary.

Table 2. Targeted Questions to the Guide the Technical Review

Table 2 is a reference to help guide advice provided in Table 1. It outlines: the federal and provincial authorities assigned to review each of the proponent’s responses to IAAC’s comments on the Impact Statement; context on how IAAC will use the information to develop the Impact Assessment Report; and targeted questions to guide the technical review. Answers to the targeted questions should be provided as distinct row entries to Table 1 and consider the relevant prompts provided.

Comment ID	Relevant Authorities	IAAC’s Focus for the Impact Assessment Report	Targeted Questions
1) Fish and Fish Habitat			
FFH-01-FFH03	DFO, ECCC, NRCan	<p>In the Impact Assessment Report, IAAC will describe the likely adverse residual effects to fish and fish habitat (using magnitude, geographic extent, duration, uncertainty etc.), taking into account both direct loss from overprinting and loss through alteration of flows.</p> <p>Primarily, IAAC’s focus is whether the anticipated harmful alteration, disruption, or destruction of fish habitat can be reasonably offset, accounting for any uncertainty in conceptual offset options (e.g., North Driftwood Diversion Channel).</p> <p>IAAC will rely on authorizations needed under the <i>Fisheries Act</i> to further refine the effects predictions, mitigation measures, and follow-up programs.</p>	<ul style="list-style-type: none"> Describe your level of confidence in the proponent’s analysis of effects to fish and fish habitat from changes to groundwater and surface water flows, including the overall predicted magnitude and geographic extent of fish habitat loss in water courses. Describe your level of confidence that, with ongoing refinement through permitting, there are likely to be sufficient offsetting measures available for the harmful alteration, disruption, or destruction of fish habitat. If needed, suggest feasible offsetting concepts. Describe any outstanding uncertainty in the geotechnical feasibility of the Natural Driftwood Diversion Channel including its ability to function as an offset for fish habitat and a location for effluent discharge. Outline any next steps for the proponent to increase certainty. <p>If there is insufficient confidence in the information provided by the proponent, provide advice to IAAC informed by the prompts in the “Advice to Inform the Impact Assessment” column of Table 1.</p>
2) Groundwater-Surface Water Interactions, where Changes May Affect Fish Habitat and Indigenous Peoples			
GW-01(a-e)	ECCC, MECP, NRCan	<p>In the Impact Assessment Report, IAAC will describe the likely adverse residual effects to fish and fish habitat (using magnitude, geographic extent, duration, uncertainty etc.), as well as the likely adverse impacts on the current use of lands and resources for traditional purposes by Indigenous peoples, resulting from changes to water quantity.</p> <p>Understanding how reasonably the groundwater model performs is necessary to interpret how well the surface water model reflects project-related changes in groundwater-surface water interactions. This information will inform IAAC’s conclusions on potential adverse effects to fish habitat and impacts to Indigenous use.</p> <p>IAAC will rely on authorizations under the <i>Fisheries Act</i> and on provincial regulatory frameworks (e.g., <i>Ontario Water Resources Act</i>, <i>Lakes and Rivers Improvement Act</i>, etc.) to further refine the effects predictions, mitigation measures, and follow-up programs.</p>	<ul style="list-style-type: none"> Describe your level of confidence in the proponent’s analysis of changes to groundwater-surface water interactions. Would surface water model predictions (changes to surface water levels, flow and quantity) reasonably reflect project-related groundwater drawdown and mounding? Describe implications of uncertainty in the groundwater-surface water interactions (see questions 3 and 4, which may overlap). Use geographic scenarios for changes to springs and surface water levels, if needed. Consider any follow-up program and adaptive management measures proposed by the proponent, or your authoritative ability to require adaptive management, to manage uncertainty in your response. <p>If there is insufficient confidence in the information provided by the proponent, provide advice to IAAC informed by the prompts in the “Advice to Inform the Impact Assessment” column of Table 1.</p>
3) Surface Water Quantity, where Changes May Affect Fish Habitat and Indigenous Peoples			
SW Quan-01(a-d) and 02(a-b)	ECCC, MECP	<p>In the Impact Assessment Report, IAAC will describe the likely adverse residual effects to fish and fish habitat (using magnitude, geographic extent, duration, uncertainty etc.), as well as the likely adverse impacts</p>	<ul style="list-style-type: none"> Describe your level of confidence in the proponent’s analysis of changes to surface water levels, flows, and quantity to inform effects on fish and fish habitat, use of waterways by Indigenous peoples.

		<p>on the current use of lands and resources for traditional purposes by Indigenous peoples, resulting from changes in flows.</p> <p>IAAC will take into account the level of confidence in the surface water hydrological model’s ability to reasonably predict potential changes to surface water levels and flows to inform predicted effects to fish habitat and use of waterways by Indigenous peoples.</p> <p>IAAC will rely on authorizations under the <i>Fisheries Act</i> and on provincial regulatory frameworks (e.g., <i>Ontario Water Resources Act, Lakes and Rivers Improvement Act</i>, etc.) to further refine the effects predictions, mitigation measures, and follow-up programs.</p>	<ul style="list-style-type: none"> Describe implications of uncertainty in the surface water model. Use geographic scenarios for changes to surface water levels, if needed. Consider any follow-up program and adaptive management measures proposed by the proponent, or your authoritative ability to require adaptive management, to manage uncertainty in your response. <p>If there is insufficient confidence in the information provided by the proponent, provide advice to IAAC informed by the prompts in the “Advice to Inform the Impact Assessment” column of Table 1.</p>
Species of Importance to Indigenous peoples, where Habitat is Lost due to Changes in Groundwater and Surface Water			
IP-01	ECCC, MECP, NRCan	<p>In the Impact Assessment Report, IAAC will consider the predicted changes to the availability of species of importance for Indigenous peoples (e.g., waterfowl, moose, etc.) and describe the likely adverse residual effects to current use of lands and resources and cultural heritage (using magnitude, geographic extent, duration, uncertainty etc.).</p> <p>This will take into account habitat loss from changes in groundwater and surface water levels, including drawdowns, mounding and flooding. Understanding this habitat loss is necessary to describes residual changes to resources available to Indigenous peoples for traditional purposes.</p> <p>IAAC will rely on provincial regulatory frameworks (e.g., <i>Ontario Water Resources Act, Lakes and Rivers Improvement Act</i>) to refine the predicted quantity of effects, mitigation measures, and follow-up programs.</p>	<ul style="list-style-type: none"> Describe your level of confidence in the proponent’s analysis of changes to the habitat of species of importance to Indigenous peoples (e.g., waterfowl, moose) from changes in groundwater and surface water levels (including drawdowns, mounding and flooding). Describe implications of uncertainty in the groundwater and surface water model. Use geographic scenarios, if needed. For example, where might wetlands be drained or flooded? <p>If there is insufficient confidence in the information provided by the proponent, provide advice to IAAC informed by the prompts in the “Advice to Inform the Impact Assessment” column of Table 1.</p>
Surface Water Quality, where Changes May Affect Fish or Indigenous peoples			
SW Qual-01 - 06	ECCC, MECP, NRCan	<p>In the Impact Assessment Report, IAAC will describe the likely adverse residual effects to fish and to the health conditions of Indigenous peoples or their current use of resources (using magnitude, geographic extent, duration, uncertainty etc.), resulting from changes in surface water quality.</p> <p>Changes in surface water quality may arise from controlled effluent, uncontrolled effluent (seepage), methylmercury production, and sediment-bound contaminants from the project.</p> <p>Understanding the geographic extent of surface water quality changes is necessary to determine potential chronic effects to fish health and</p>	<ul style="list-style-type: none"> Describe your level of confidence in the proponent’s analysis of changes to surface water quality from planned effluent, unplanned effluent (seepage), methylmercury production, and sediment contamination. Consider any follow-up program and adaptive management measures proposed by the proponent to manage uncertainty in your response. Where applicable, outline any next steps that may be necessary through provincial regulatory requirements to improve confidence. Describe your level of confidence that, with ongoing refinement, the current project design will result in an effluent mixing scenario that can feasibly align with provincial policies that support issuance of an Environmental Compliance Approval for Industrial Sewage Works. Outline any next steps that may be necessary through provincial regulatory requirements to improve confidence or make a future determination.

		<p>measures needed to mitigate health risks to Indigenous peoples from their use of water or fish.</p> <p>Further, IAAC seeks to understand the potential for future project redesigns and to build confidence in the management of mine effluent in considering federal (i.e., <i>Fisheries Act, Metal and Diamond Mining Effluent Regulations</i> Schedule 4) and provincial (e.g., Environmental Compliance Approval for Industrial Sewage Works) regulatory frameworks. IAAC will rely on these federal and provincial regulatory frameworks to further refine the effects predictions, mitigation measures, and follow-up programs.</p>	<ul style="list-style-type: none"> Describe your level of confidence in the proponent’s analysis of changes to surface water quality from a potential rail accident resulting in the release of nickel concentrate, including the geographic extent of potential effects. <p>If there is insufficient confidence in the information provided by the proponent, provide advice to IAAC informed by the prompts in the “Advice to Inform the Impact Assessment” column of Table 1.</p>
Geochemistry, where Conditions Influence Water Quality and Effects to Fish and Fish Habitat and Indigenous peoples			
GCH-01(a-e) – 02 (a-d)	NRCan, MECP	<p>In the Impact Assessment Report, IAAC will describe the potential adverse residual effects to fish and fish habitat and impacts to Indigenous peoples (using magnitude, geographic extent, duration, uncertainty etc.), considering changes in surface water quality which are modelled based on the geochemical properties of mine materials. Understanding any uncertainties in the geochemical characterization program is necessary to understand effects to fish and fish habitat and to Indigenous peoples.</p> <p>IAAC will rely on provincial regulatory frameworks (e.g., <i>Ontario Water Resources Act, Mining Act</i>) to refine the effects predictions, mitigation measures, and follow-up programs.</p>	<ul style="list-style-type: none"> Describe your level of confidence in the proponent’s geochemical characterization program to understand potential changes to surface water quality. Consider any future sampling, follow-up program, specific mine waste management strategies, water management plans, or other plans, and requirements of provincial regulatory frameworks to manage uncertainty in your response. <p>If there is insufficient confidence in the information provided by the proponent, provide advice to IAAC informed by the prompts in the “Advice to Inform the Impact Assessment” column of Table 1.</p>