June 8, 2026

CIAR Project Reference #: 83857

Mr. Grant Jensen, Project Manager
Impact Assessment Agency of Canada
600-55 York Street
Toronto, Ontario M5J 1R7
Telephone: 416-952-1576

Sent via the Crawford Nickel Project Registry

Reference: Response to the Crawford Nickel Project Draft Impact Assessment Report and Potential Conditions

Dear Mr. Jensen,

Canada Nickel Company (Canada Nickel) has now had the opportunity to review the draft Impact Assessment Report (IA Report) and Potential Conditions (CIAR #194) for the Crawford Nickel Project (the Project). We recognize the Impact Assessment Agency of Canada's (IAAC) efforts in preparing the draft IA Report, including its conclusions and recommendations regarding adverse effects within federal jurisdiction, proposed mitigation measures, and proposed follow-up programs. We appreciate that this information has been informed by information provided by Canada Nickel as well as federal agencies, project stakeholders, members of the public and Indigenous Nations potentially impacted by the Project.

The draft IA Report and proposed conditions of approval represent a key step in the Federal IA process for this Project to inform the Minister's decision.

As the proponent of the Project, Canada Nickel remains committed to working collaboratively with IAAC, regulatory agencies, Indigenous Nations, and project stakeholders to advance a Project that is environmentally responsible, aligned with applicable regulatory requirements, and in the public interest.

The comments provided herein are intended to provide input on the draft IA Report and Potential Conditions, and to highlight the Project's importance, benefits, and contributions to sustainability. The comments also aim to foster the development of clear, implementable, and effective conditions that appropriately reflect the Project, its anticipated effects, proposed mitigation measures, follow-up programs, and commitments throughout the impact assessment and regulatory processes.

Comments have been structured into five overall themes, including:

1. Overall Comments on the Draft IA Report
2. The Project's Contributions to Sustainability
3. Benefits of the Project
4. Commitment to Continued Indigenous Nation Engagement
5. Comments on Potential Conditions

1 Overall Comments on the Draft IA Report and Potential Conditions

Based on the information presented in the draft IA Report, Canada Nickel recognizes IAAC's assessment of the Project's adverse residual effects within federal jurisdiction and notes that the conclusions reached are generally consistent with the extensive technical information, analyses, mitigation measures, and follow-up commitments presented throughout the Impact Statement and subsequent submissions. The draft IA Report identifies adverse residual effects of moderate significance for fish and fish habitat and migratory birds, and adverse residual effects of low significance for wetlands, physical and cultural heritage, the current use of lands and resources for traditional purposes by Indigenous Peoples, and the health, social, or economic conditions of Indigenous Peoples. Canada Nickel appreciates IAAC's consideration of the substantial body of information provided during the impact assessment process and its recognition of the mitigation, monitoring, and adaptive management measures that have been incorporated into the Project to avoid, minimize, and manage potential effects.

Canada Nickel acknowledges the mitigation measures identified by IAAC in the draft IA Report and would commit to the implementation of these measures to address potential adverse effects within federal jurisdiction should this Project be approved. As the proponent, Canada Nickel is committed to implementing mitigation measures that are clear, practicable, and aligned with the Project as assessed, and will integrate the mitigation measures committed to in the Impact Statement into Project design, construction, operations, and decommissioning. Canada Nickel also recognizes the importance of follow-up and adaptive management and will continue to work with IAAC, relevant authorities, and identified Indigenous Nations to support monitoring programs that are focused, feasible, and responsive to the outcomes of the Project. Further commentary on follow-up programs is provided in Section 5 below.

2 The Project's Contributions to Sustainability

The Project represents a major advancement in Canada's transition to a low-carbon economy, positioning the country as a global leader in the supply of critical minerals. Both the federal and provincial governments have recognized the importance of the Project through the federal referral of the Project to the Major Projects Office[1] as a Project of National Interest and the provincial decision to move the Project forward under the "One Project, One Process" framework[2]. In announcing the Project's referral to the Major Projects Office, Prime Minister Mark Carney stated that the Crawford Nickel Project will "serve as an anchor Canada's global leadership in clean industrial materials" and noted it represents "a model for the future of responsible mining." Similarly, Ontario Minister of Energy and Mines Stephen Lecce identified the Project as part of the Province's efforts to unlock "one of the world's largest nickel deposits that will supercharge our economy" and reduce reliance on foreign critical mineral supply chains.

The goal, both federally and provincially, is to make the permitting and approval process for the Project more efficient, while continuing to uphold the Duty to Consult and environmental standards. As one of the largest nickel resources in the world, the Project is expected to produce high-quality, low to potentially net-zero carbon nickel essential for batteries and stainless steel, supporting clean energy technologies and advanced manufacturing. The Project is anticipated to play a key role in strengthening Canada's clean industrial economy by contributing to critical infrastructure, enabling resource diversification, and supporting long-term economic resilience in alignment with provincial and federal critical minerals strategies.

Canada Nickel acknowledges that the Project will result in adverse residual effects on Indigenous and Treaty Rights and consideration of these effects are being integrated in the Impact Benefit Agreements (IBA) under negotiation with the Indigenous Nations (refer to Section 4 for additional information). The Project is also anticipated to provide positive economic benefits for Indigenous Nations, which is reflected in the draft IA Report. Since submission of the Impact Statement, not only has Canada Nickel continued to advance IBAs with potentially impacted Indigenous Nations, but it has also entered into various own-source revenue generating agreements with Indigenous Nations to create additional positive economic effects, including, but not limited to, the following:

- Taykwa Tagamou Nation invested $20 million in Canada Nickel through a convertible note financing arrangement, creating a pathway to equity ownership in the Company and securing representation on Canada Nickel's Board of Directors. At the time of the transaction, this represented the largest known investment by a First Nation in a Canadian critical minerals project. The investment represents a significant step toward Indigenous participation in Project governance and long-term economic development, aligning the Nation's interests with the success of the Project while providing a mechanism for shared decision-making and oversight at the corporate level. The investment demonstrates a collaborative approach that extends beyond consultation

[1] Natural Resources Canada. 2025. Canada Nickel's Crawford Project referred to the Major Projects Office. Retrieved May 20, 2026 from https://www.canada.ca/en/natural-resources-canada/news/2025/11/canada-nickels-crawford-project-referred-to-the-major-projects-office.html.

[2] Ministry of Energy and Mines. 2026. Ontario Fast-Tracks Western World's Largest Nickel Project Under 'One Project, One Process'. Retrieved May 20, 2026 from https://news.ontario.ca/en/release/1006914/ontario-fast-tracks-western-worlds-largest-nickel-project-under-one-project-one-process.

toward meaningful participation in the economic opportunities associated with critical minerals development.

- Canada Nickel signed an agreement with Mattagami, Matachewan, and Flying Post First Nations through Wabun Tribal Council that sets the framework for early business and employment opportunities, while the parties continue to work towards a comprehensive Impact Benefit Agreement (IBA). The agreement includes commitments for open-book negotiations on key contracting opportunities, including the construction of a 25-kilometre railway line, the relocation of Highway 655, and the construction of a temporary overpass on Highway 655. These initiatives aim to foster economic development while enhancing the long-term economic priorities of the three First Nations. These projects will prioritize First Nations businesses and promote own-source revenue, foster partnerships, and support regional growth.

While the draft IA Report expresses uncertainty in the ability of the Project to contribute to Canada's climate change commitments, Canada Nickel continues to advance innovative technologies that have the potential to materially enhance the Project's climate benefits and support Canada's transition to a low-carbon economy. The ability of ultramafic rocks to naturally react with and permanently store carbon dioxide through mineral carbonation has been studied and documented for many years, and the Crawford Nickel Project is uniquely positioned to apply this natural process at scale due to the nature and volume of its ultramafic host rock and tailings. Central to these efforts is Canada Nickel's In Process Tailings Carbonation (IPT Carbonation) technology, which utilizes the natural carbon sequestration properties of ultramafic tailings to permanently capture and store carbon dioxide. Based on current estimates, IPT Carbonation has the potential to sequester up to 1.5 million tonnes of CO_2 annually and approximately 54 million tonnes of CO_2 over the life of the Project. This would position the Crawford Nickel Project as one of the largest permanent carbon storage opportunities associated with a mining project in Canada and demonstrates how critical minerals development can contribute to both economic growth and climate objectives. Since the submission of the Impact Statement, Canada Nickel has continued to advance initiatives intended to further enhance the carbon reduction and carbon sequestration potential associated with similar deposits in the region and abroad, including:

- Signing a Memorandum of Understanding with GeoRedox Corporation to evaluate technologies that leverage ultramafic rock formations to produce geologic hydrogen with the potential for minimal associated carbon emissions;[3]

- Completing an in-situ carbon sequestration pilot study at the Project in collaboration with the U.S. Department of Energy's Advanced Research Projects Agency – Energy (ARPA-E), generating additional information regarding the potential for permanent in situ carbon storage[4]

- Entering into a strategic partnership with NetCarb to evaluate technologies that may significantly increase carbon sequestration from mine tailings, potentially enhancing sequestration rates beyond

[3] Canada Nickel Company. 2026. GeoRedox and Canada Nickel Launch First-of-its-kind Geologic Hydrogen Program at Crawford Nickel Project in Timmins, Ontario. Retrieved on May 20, 2026 from https://wp-canadanickel-2025.s3.ca-central-1.amazonaws.com/media/2026/05/CNC-_PR_Georedox-May-2026_VFF_05.20.2026.pdf.

[4] Canada Nickel Company. 2026. Canada Nickel and the University of Texas Successfully Complete Carbon Sequestration Pilot at the Crawford Nickel Project. Retrieved on May 20, 2026 from https://wp-canadanickel-2025.s3.ca-central-1.amazonaws.com/media/2026/02/CNC-Canada-Nickel-Completes-Carbon-Sequestration-Pilot_FINAL-3_02.19.2026.pdf.

those currently anticipated through IPT Carbonation while also generating additional value-added products.[5]

Collectively, these initiatives build upon the Project's unique geological characteristics and reinforce Canada Nickel's objective of developing a low to potentially net-zero carbon industrial cluster in Northeastern Ontario. They also demonstrate that the Project's climate-related benefits continue to evolve as technologies mature and additional research is completed. As a result, the Project's potential contribution to climate change mitigation may be greater than currently reflected in the draft IA Report.

[5] Canada Nickel Company. 2025. Canada Nickel and NetCarb Advance Strategic Partnership to Unlock Zero Carbon Industrial Cluster in Northeastern Ontario. Retrieved May 20, 2026 from https://wp-canadanickel-2025.s3.ca-central-1.amazonaws.com/media/2025/10/251006-NetCarb-Products_VF1.pdf.

3 Benefits of the Project

The Project is positioned to become one of the most significant critical minerals developments in Canadian history. As one of the largest nickel sulphide resources globally, the Project has the potential to make a meaningful contribution to Canada's long-term critical minerals security, clean industrial growth, and allied supply chain resilience. The Project is designed to responsibly and sustainably extract and process key critical minerals, primarily nickel, as well as iron, chromium, cobalt, palladium, and platinum. These minerals are essential inputs for a wide range of strategic sectors, including batteries, electric vehicles, stainless steel, clean energy infrastructure, defence-related applications, and advanced manufacturing. Demand for these minerals is expected to grow substantially in the coming decades. According to the Ministry of Energy, Northern Development and Mines[6] and Natural Resources Canada[7], global demand for critical minerals is accelerating, and by 2050, minerals such as nickel, iron, and cobalt could see demand increases of up to 500 percent to support clean energy technologies[8]. In this context, the Project is well positioned to support federal and provincial objectives to increase domestic production of responsibly sourced critical minerals and reduce reliance on supply chains that may be vulnerable to geopolitical, trade, or market disruptions.

Independent analysis estimates completed since the submission of the Impact Statement indicate the Project will generate over $70 billion in gross domestic product over its 40 plus year mine life[9]. The Project is expected to support approximately 1,000 direct and 3,000 indirect and induced jobs, totaling 185,000 person years of employment, and deliver approximately $16 billion in labour income[9]. The Project is also projected to contribute $7.7 billion in federal tax revenues and $8.3 billion in provincial tax revenues over the life of the mine[9]. These benefits would extend beyond the immediate Project footprint, supporting regional businesses, contractors, suppliers, Indigenous economic participation, workforce development, municipal and provincial revenues, and long-term economic diversification in Northeastern Ontario. The scale and duration of these benefits are particularly significant given the Project's anticipated 41-year operating life, which provides the potential for sustained employment, training, procurement, and community investment over multiple generations.

The Project's benefits should also be considered in the broader public interest context. In addition to its direct economic contributions, the Project would support Canada's ability to supply low to potentially net-zero carbon nickel and other critical minerals required for the energy transition, while advancing a major resource project in a jurisdiction with strong environmental, labour, Indigenous consultation, and regulatory standards. As a result, the Project represents an opportunity to align critical minerals development with sustainability, reconciliation, economic resilience, and climate-related objectives.

---

[6] Ministry of Energy, Northern Development and Mines. 2021. Ontario's Critical Minerals Strategy 2022–2027: Unlocking potential to drive economic recovery and prosperity. Retrieved December 10, 2023, from https://www.ontario.ca/page/ontarios-critical-minerals-strategy-2022-2027-unlocking-potential-drive-economic-recovery-prosperity#section-2.

[7] Natural Resources Canada. 2022. The Canadian Critical Minerals Strategy. Retrieved April 23, 2024, from https://www.canada.ca/content/dam/nrcan-rncan/site/critical-minerals/Critical-minerals-strategyDec09.pdf.

[8] World Bank Group. 2020. Minerals for Climate Action: The Mineral Intensity of the Clean Energy Transition. May, 2020.

[9] Canada Nickel Company. 2025. Canada Nickel Releases Positive Results from Crawford Nickel Project Economic Impact Study. Retrieved May 20, 2026 from https://wp-canadanickel-2025.s3.ca-central-1.amazonaws.com/media/2025/10/CNC-PR-Preliminary-Economic-Study-Release-20251006-VF2.pdf.

4 Commitment to Continued Indigenous Nation Engagement

Canada Nickel recognizes the importance of working in partnership with Indigenous Nations to establish a mutually beneficial, cooperative, and productive relationship centered around transparent information sharing, respectful engagement, open dialogue, and meaningful partnerships. To demonstrate Canada Nickel's commitment to working with Indigenous Nations, Canada Nickel is currently co-developing Impact Benefit Agreements and Mutual Support Agreements with the potentially impacted Indigenous Nations, in addition to honouring signed Exploration, Impact Assessment, and Relationship Building Agreements, providing for sustained collaboration throughout the life of the Project.

As committed to in the Impact Statement, Canada Nickel will:

- Engage with the Indigenous Nations to implement culturally relevant on-site services important for the retention of Indigenous employees
- Provide an opportunity for interested Indigenous Nations to conduct ceremonies on site (e.g., water ceremony, tobacco ceremony, smudging ceremony)
- Engage with the Indigenous Nations to develop the cultural awareness training and associated corporate policies for the Project so that it includes topics of importance to the Nations
- Notify and work with Indigenous Nations who have expressed an interest in harvesting plants within the Project Area before construction to provide safe access for these activities, prior to any clearing occurring
- Conduct the Stage 2 Archaeological Assessment with the participation of interested Indigenous Nations
- Engage with the Indigenous Nations throughout the life of the Project to develop a shared understanding of how the Project may affect their interests, discuss the Project and its effects, understand concerns that may arise and respond to those concerns
- Engage with the Indigenous Nations to seek their opinions, recommendations and Nation-specific expertise in the development of mitigation measures, follow-up and adaptive management programs relating to biodiversity and social and economic conditions, as applicable
- Work directly with the Indigenous Nations to identify opportunities for the Indigenous Nations to realize potential benefits from the Project that can be used to both offset potential adverse effects and create positive effects for the Indigenous Nations

Canada Nickel will continue engagement with potentially impacted Indigenous Nations throughout all Project phases, with a focus on addressing questions and concerns, understanding interests in training, employment, and contracting, gathering ongoing input including Indigenous Knowledge, advancing agreements and soliciting input on follow-up programs.

5 Comments on Potential Conditions

Canada Nickel supports the overarching approach reflected in the draft Potential Conditions, which emphasizes precaution, the use of best available information and technologies, and the involvement of qualified individuals and Indigenous Knowledge in Project decision-making and implementation. Canada Nickel considers this approach to be consistent with the commitments outlined in the Impact Statement.

Canada Nickel also acknowledges the comprehensive nature of the proposed Potential Conditions, including requirements related to consultation and engagement, follow-up programs, monitoring, and reporting, which are intended to verify the effectiveness of mitigation measures and support ongoing adaptive management. Overall, Canada Nickel is supportive of these measures as a basis for advancing the Project in a clear, transparent, and well-managed manner. Specific comments on select Potential Conditions have been included in Attachment A.

6 Closure

Canada Nickel appreciates IAAC's consideration of the comments provided in this submission and respectfully requests that they be considered in finalizing the IA Report and Potential Conditions for the Project. In our view, the Project represents an important opportunity to advance Canada's critical minerals supply, support long-term economic and sustainability objectives, and strengthen Indigenous participation in Project development, while managing adverse effects through appropriate mitigation, follow-up, and adaptive management. Canada Nickel remains committed to continuing to work with IAAC, regulatory agencies, and Indigenous Nations as the Project advances through future phases.

Sincerely,

[Original signed June 8, 2026]

Pierre-Philippe Dupont
Vice President of Sustainability
Canada Nickel Company Inc.

[Original signed June 8, 2026]

Mathieu Boucher
Environmental Manager
Canada Nickel Company Inc.

Attachment(s):
Attachment A Canada Nickel's Response to Potential Conditions Established under section 64 of the Impact Assessment Act

Attachment A Canada Nickel's Response to Potential Conditions Established under section 64 of the Impact Assessment Act

Table 1. Canada Nickel's Response to Potential Conditions Established under section 64 of the Impact Assessment Act

Number	Condition	Response
2.11	The first reporting year for which the Proponent shall prepare an annual report pursuant to condition 2.9 shall start on the day the Minister of the Environment issues the Decision Statement pursuant to subsection 65 (1) of the *Impact Assessment Act*.	Canada Nickel requests that the first reporting year be tied to the start of construction activities as opposed to the issuance of the Decision Statement. Construction is currently scheduled to commence in fall 2027. If the reporting year begins on issuance of the Decision Statement, there would be no or limited Project activities during the initial reporting period and the first annual report would not provide meaningful information, as there would be no/limited activities or follow-up results to report.
3.2.1	continually refine the site water quality model with predictions for contaminants of potential concern, based on ongoing geochemical testing throughout construction and operation, and adapt the mine waste management plan prior to final closure; and	To improve clarity and support consistent implementation, Canada Nickel suggests either defining the term "continually" within the condition or replacing it with "periodically," which would provide greater flexibility while still supporting regular review and refinement of the site water quality model based on geochemical testing results, as committed to by Canada Nickel in the Impact Statement.