



June 10, 2026

Larissa Goshulak
Senior Consultation Analyst, Ontario Region
Impact Assessment Agency of Canada
600-55 York St.
Toronto ON M5J 1R7

Via email: Crawford@iaac-aeic.gc.ca

Dear Ms. Goshulak:

Re: Draft Impact Assessment Report and Potential Conditions for the Crawford Nickel Project

I am writing on behalf of Brunswick House First Nation to express our serious concerns about and recommendations for the Draft Impact Assessment Report and Potential Conditions for the Crawford Nickel Project (the “Project”).

OVERVIEW

Brunswick House First Nation is a signatory to Treaty 9 whose members exercise treaty rights to fish, hunt, trap, and carry on our way of life across our territory, which includes land and waters immediately adjacent to the Project area. Our nation was not engaged on the Project until 2024 when we requested to meet with the proponent and informed them that the Project presented risk to our ability to continue exercising our treaty rights.

Our rights near the Project area were not previously recognized due to the harms caused by one century of dispossession from our lands and the resulting dispersal of our community. In 2023 Ontario formally recognized that our territory extends to an area next to the Project. Accordingly, the Impact Assessment Report and Potential Conditions must be revised to recognize Brunswick House First Nation as an Indigenous community that may be adversely impacted by the Project, must be consulted with, and that must be involved in the Project’s monitoring and mitigation efforts.

Brunswick House First Nation has concerns about the Project’s impacts on our treaty rights. Brunswick House First Nation requires that the Impact Assessment Report and Conditions take our concerns regarding the Project into account to minimize adverse effects on our treaty rights. Specifically, we are concerned about:



- the removal of fish habitat, the potential contamination of fish, and the impacts on our treaty fishing rights;
- the protection of the Mattagami River;
- the removal of moose habitat and other impacts to moose populations;
- impacts to our treaty right to trap;
- the Impact Assessment Agency of Canada does not have measures in place to monitor and address cumulative effects, and downgraded potential cumulative effects; and
- the protection of Brunswick House First Nation ancestral and cultural sites.

Below, we set out in detail our concerns regarding our inclusion as an Indigenous community that must be consulted with on the Project, as well as the concerns regarding impacts to our treaty fishing, hunting, trapping rights, and our cultural values that may be impacted by the Project. We also provide in detail our recommendations and requirements to address these concerns.

BRUNSWICK HOUSE FIRST NATION'S CONCERNS & REQUIREMENTS

Brunswick House First Nation may be adversely impacted by the Project

The Draft Impact Assessment Report must be updated to include Brunswick House First Nation as among the Indigenous communities that may be adversely impacted by the Project. At the time that the Indigenous Engagement and Partnership Plan was created, Brunswick House First Nation was beginning a process with the support of Ontario to reconnect with our traditional knowledge and our members' historical and current land use. This process was necessary as our nation had been dispossessed from the heart of our territory when the Chapleau Crown Game Preserve was created. Our members were dispersed and disconnected from each other and our lands. For decades the transmission of our traditional knowledge, including the extent of our territory, was disrupted.

In 2023, we aligned our territorial assertions with the traditional knowledge about our nation's use of the land. Through this work, we confirmed that our members currently use land and waters adjacent to the Project to exercise treaty rights, and that our ancestors have used the land and waters near the Project for generations. Specifically, the Project area is located next to traditional water travel routes along which our members have lived, harvested food from both the land and water, created burial sites, and carried out ceremony.

A number of exploration and development activities for the Project have already taken place without consultation with Brunswick House First Nation. These activities have interfered – and continue to interfere – with the First Nation's right to governance and stewardship. They have impacted and continue to impact Brunswick House First Nation's rights to hunt, fish, trap, and carry on our way of life.



The Project's impacts may continue to adversely impact Brunswick House First Nation's treaty rights. The Impact Assessment Agency of Canada therefore has a legal obligation to consult with our nation with regard to the Project and its impacts. Furthermore, Canada has a duty to ensure that our traditional sites and our ability to exercise our treaty rights near the Project are protected. To meet these obligations, the Impact Assessment Agency of Canada must include Brunswick House First Nation as an Indigenous community that may be adversely impacted by the Project and must be consulted with in the Impact Assessment Report.

Concerns regarding impacts to fish, and fish habitat

Brunswick House First Nation is concerned about the vast area of fish habitat that will be either destroyed or altered by the Project, and other potential impacts on the size of fish populations near the Project area. The loss of fish habitat will introduce new pressures on fish populations in other regions, including regions in Brunswick House First Nation territory.

Brunswick House First Nation members fish near the Project area, as well as in the other areas across our territory. We anticipate potential impacts to the availability of fish not only right around the Project area, but also at further distances within our territory as fishers seek out new fishing locations. Increased fishing in areas of Brunswick House First Nation territory has the potential to impact our Treaty fishing rights. The new pressures on fish populations across our territory must be monitored and mitigated. Brunswick House First Nation has an interest in participating in the development and implementation of such programs.

Brunswick House First Nation is also concerned about the contaminants released or seeped from the Project into the region's waterbodies, and the potential impacts to the safety of fish that our members consume. As explained above, our members harvest fish for consumption near the Project area and could be impacted by potential contamination of waterways and fish in the area. Brunswick House First Nation must be informed of any potential or confirmed contamination to fish populations caused by the Project and be involved in mitigation efforts to protect our Treaty rights.

Protection of the Mattagami River

The Mattagami River is used by Brunswick House First Nation for travel and harvesting and is of high cultural significance to our nation as our ancestors also travelled along it by canoe. We note that the Impact Assessment Agency of Canada has informed Brunswick House First Nation that it no longer predicts that effluent from the Project will enter the Mattagami River. Brunswick House First Nation is pleased that this change has been made, and seeks confirmation that measures are in place to protect the Mattagami River from emergencies such as tailings failures.



Concerns regarding impacts to moose populations

Brunswick House First Nation members have observed a decline in the size and health of local moose populations that we rely on for food and to exercise our treaty right to hunt. The loss of a sizeable area of moose habitat, and other impacts to moose (e.g. noise disturbance, increased traffic, contamination, etc.) where moose populations are already impacted is of great concern to our nation.

We have observed a decline in our members' physical and mental health as a result of the declining moose population and moose health. Furthermore, we have observed that these issues with the moose population have caused barriers to the transfer of our traditional knowledge.

The Project must be carried out in a way that protects the moose and their habitat. Brunswick House First Nation requests that the Impact Assessment Agency of Canada requires the establishment and operation of moose population and habitat protection strategy in relation the Project's impacts. This initiative must be First Nation-led and informed by the traditional knowledge of the impacted First Nations. Brunswick House First Nation requests a role as part of any moose protection initiative.

Concerns regarding cumulative effects

Our territory, particularly in areas near the Project area, is subject to extensive development and associated impacts. The Project will exacerbate the cumulative effects of past, ongoing, and future resource development on the land, water, and our treaty rights.

Brunswick House First Nation has also experienced over a century of dispossession from a significant part of our territory that is now within the Chapleau Crown Game Preserve. In 1925 it became illegal for our members to hunt or trap within the large area of our territory that is now the Chapleau Crown Game Preserve. This caused our members to be dispersed and suffer socially, economically, culturally, and with regard to our health. The impacts associated with the Chapleau Crown Game Preserve are severe and have been exacerbated by resource development across our territory. Our membership has also noticed a declining moose population and poor moose health impacting our ability to harvest moose. The Project will further exacerbate these impacts on our nation.

Brunswick House First Nation disagrees with the Impact Assessment Agency of Canada's assessment that the cumulative effects on the current use of land and resources for traditional purposes by Indigenous Peoples as moderate, and on the health, social, or economic conditions of Indigenous Peoples as low to moderate. For our nation, exercising our rights and reconnecting with the land and community is key to our nation rebuilding and healing from past and existing impacts. The Project is expected to cause impacts that will interfere with our nation's ability to rebuild, preserve cultural continuity, and heal, and will further exacerbate the issues we are



already dealing with. From our perspective and based on our experience in a highly industrialized landscape, the cumulative effects of the Project on our current use of the land and resources for traditional purposes, on our health, social and economic conditions are likely to be severe.

We expect that the Impact Assessment Agency of Canada will require the Proponent to establish and implement a mechanism to measure and mitigate the cumulative effects that are Project-specific. This mechanism must be developed with the impacted First Nations, who must also have lead roles in its implementation. Brunswick House First Nation requests to have a role in the development and implementation of this mechanism. Brunswick House First Nation must also be involved in the mitigation measures proposed by the Impact Assessment Agency of Canada.

Protecting cultural values and sites

The Project is located in an area that has been used by members of Brunswick House First Nation for generations. Our ancestors travelled the waterways in this area and used the surrounding land extensively. As our ancestors lived in and used the area, there is potential that Brunswick House First Nation living sites, harvest sites, ceremonial sites, and burial sites are located within the Project area. The exact locations of these sites are currently unknown to Brunswick House First Nation, but it is deeply important to our nation that these sites be protected, and if found, that our nation's protocols are followed.

To ensure that our cultural sites are protected and cared for by our nation and in accordance with our Brunswick House First Nation protocols, we must be involved in the development of the Archeological and Cultural Resources Management Plan. Our participation is important to minimize loss of access to culturally significant sites and to the transmission of our traditional knowledge.

Brunswick House First Nation must be consulted with and have a say on the Project

The Conditions on the Project for inclusion in a Decision Statement must be revised to include Brunswick House First Nation as an Indigenous group (as defined at subsection 1.19 of the Potential Conditions) to be consulted with on this project and involved in monitoring.

Due to historical harms and oppression resulting in the disconnection of our nation from our land and culture for several decades, Brunswick House First Nation was not consulted on earlier stages of the Project. It was not until 2024 when Brunswick House First Nation requested a meeting with the Proponent that engagement with our nation was initiated, and without capacity necessary to retain subject matter experts to assist us in this engagement. Now that the Impact Assessment Agency of Canada and the Proponent have been informed about Brunswick House First Nation's relationship with the Project area, and since the Project's activities have the



potential to impact our ability to exercise treaty rights, our right to be consulted on and involved in the decisions relating to the Project must be respected.

To ensure Brunswick House First Nation's rights are upheld, our nation requires that the Potential conditions established under section 64 of the *Impact Assessment Act* (the "Conditions") be revised as follows:

- at subsection 1.19 – *Indigenous groups* mean the following Indigenous Peoples: Apitipi Anicinapek Nation, Brunswick House First Nation, Flying Post First Nation, Matachewan First Nation, Mattagami First Nation, Métis Nation of Ontario (Region 3), Taykwa Tagamou Nation.


The Impact Assessment Agency of Canada has an obligation to include Brunswick House First Nation as a defined *Indigenous group* for the purpose of the Conditions so that it can properly discharge its duty to consult with our nation. The Conditions include requirements for consultation and information sharing with the *Indigenous groups*. Brunswick House First Nation has a right to also be consulted with, and to have information shared about the Project.

Brunswick House First Nation requests this revision because we want to ensure that we are informed and have a say on decisions that may impact our rights. These revisions would also recognize our governance and stewardship rights on land that is expected to be impacted by the Project. As described above, Brunswick House First Nation has concerns about the Project's potential impacts. Brunswick House First Nation seeks to participate in information sharing and mitigation efforts for the Project to minimize impacts and protect our rights.

NEXT STEPS

The Impact Assessment Agency of Canada must consider and address the requirements and concerns set out in this letter in the Impact Assessment Report and Conditions. Brunswick House First Nation requests a meeting with the Impact Assessment Agency of Canada to discuss the recognition and inclusion of our nation as an Indigenous community that may be adversely impacted by the Project, and our right to be consulted on and involved in the decisions relating to the Project must be respected. We look forward to your response with proposed meeting dates.

Sincerely,

Signed by:

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Chief Cheryl St. Denis

Brunswick House First Nation

Cc: Lorraine Tangie, Councillor, Brunswick House First Nation



Amberly Quakegesic, Councillor, Brunswick House First Nation
Bonnie Saunders, Councillor, Brunswick House First Nation
Bev Tangie, Councillor, Brunswick House First Nation
Irene Redbreast, Councillor, Brunswick House First Nation
Lisa Vanbuskirk, Councillor and Lands and Resources Manager, Brunswick House First Nation
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