



# MÉTIS NATION OF ONTARIO

## Lands, Resources and Consultations

June 10, 2026

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**Sent via email:**  
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Dear Larissa Goshulak:

**RE: Abitibi Inland Métis Community's Review of the Crawford Nickel Project Draft Impact Assessment Report (May 2026) and Potential Conditions under the *Impact Assessment Act*, 2019.**

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This letter is submitted to the Impact Assessment Agency of Canada (“IAAC”) by the Abitibi Inland Métis Community (“AIMC” also referred to as “Region 3”). On May 11, 2026, IAAC began a 30-day comment period for its Draft Impact Assessment Report (the “Draft IA Report”) and the Potential Conditions for the Crawford Nickel Project (the “Project”). The AIMC completed a review of the Draft IA Report with a focus on determining the adequacy of the IAAC’s assessment of impacts of the Project on the AIMC’s s. 35 rights and whether the Potential Conditions sufficiently mitigate those impacts.

As outlined below, the AIMC have significant ongoing concerns regarding the assessment of Project impacts, as many remain unresolved. Significant issues have been raised as part of MNO’s submissions to IAAC regarding: the Initial Project Description (September 7, 2022); the Tailored Information and Studies Guidelines (March 8, 2023); and Indigenous Engagement and Participation Plan (March 8, 2023), yet many remain unaddressed in the Draft IA Report. While the AIMC and Canada Nickel Company (“CNC” or the “Proponent”), are in discussions related to AIMC’s outstanding concerns as well as future consultation and accommodation on the Project, no formal agreement has been reached to date.

Overall, the AIMC’s review found that IAAC primarily applied a pan-Indigenous approach throughout its assessment, including a continued lack of integration of the AIMC’s traditional knowledge and land use data or meaningful consideration of impacts specific to Métis rights.

It is the AIMC’s position that the duty to consult and accommodate the AIMC in relation to the Project remains unfulfilled by the Crown. As such, the AIMC requests that no final decisions regarding the Project be made until these concerns regarding impacts to Métis s. 35 rights, interests, and Way of Life have been addressed, mitigated, offset, or accommodated, where required.

### Overview

The AIMC retained MNP LLP to conduct a review and analysis of past AIMC issues and concerns throughout the impact assessment process and compare them with IAAC’s characterization within the Project Draft IA Report. The review focused on the adequacy of this review; past comments considered included:

- The AIMC (Métis Nation of Ontario Region 3) response comments on the Initial Project Description filed on September 7, 2022;
- The AIMC (Métis Nation of Ontario Region 3) response comments on the Tailored Information and Studies Guidelines and Indigenous Engagement and Participation Plan response filed on March 8, 2023;
- The AIMC (Métis Nation of Ontario Region 3) Impact Study for the Crawford Nickel Mine Project (June 2024);
- Questions and Comments on the Canada Nickel Company's Project Impact Statement filed March 4, 2025, and
- The AIMC (MNO Region 3) Consultation Committee Feedback on the Crawford Nickel Project Federal Impact Assessment – Preliminary Assessment of Impacts on the Métis Nation of Ontario filed September 29, 2025.

Additionally, the Potential Conditions under Section 64 of the *Impact Assessment Act* (“**Potential Conditions**”) were reviewed relative to their adequacy in addressing impacts to the AIMC’s s. 35 rights, with detailed comments in Appendix “**C**”.

Moreover, the AIMC met with IAAC to discuss the Draft IA Report and Potential Conditions during the comment period, where they shared further details concerning traditional knowledge and land use information to be incorporated into the IA Report. The AIMC has confidentially included that information for IAAC’s reference as Appendix “**D**” to this letter. The IAAC also provided a presentation which included a summary of its assessment, however due to time constraints the AIMC was not able to provide comments during the meeting. The AIMC has subsequently reviewed the presentation with those comments provided in Appendix “**B**”. Additional historic information in the Project area is included in the Métis National Council Expert Panel’s Final Report at [www.metisnation.org/expert-panel/](http://www.metisnation.org/expert-panel/).

Below is a summary of key comments and concerns, which are discussed in detail in the attached appendices:

- **Appendix A** – Draft IA Report Comments – Comparison with Previously Raised Concerns
- **Appendix B** – Draft IA Report Comments – Additional Technical Review
- **Appendix C** – Potential Condition Comments
- **Appendix D** – Supplementary AIMC Traditional Knowledge and Land Use Data (CONFIDENTIAL)

### **AIMC Comments on the Draft IA Report**

#### ***Métis Rights***

Métis rights are not explicitly or fully addressed in the Draft IA Report but instead are treated generically under the umbrella of “Indigenous Peoples”.

There is high-level recognition of Métis rights generally in Section 4.3.2 (Page 92) whereby there is acknowledgement that the Project is within MNO Region 3, and the Métis have recognized Section 35 rights affirmed through case law (i.e., *R. v. Powley*). The rights are described later in Section 4.3.2 in the subsection specific to the AIMC whereby rights of hunting, trapping, gathering plants and fishing; as well as cultural continuity and governance and stewardship are described. However, these descriptions do not adequately characterize Métis rights within the Study Area. For example, the IAAC inaccurately describes the Abitibi Inland Métis Community’s Traditional Territory, where MNO Region 3 citizens have exercised their rights for generations, as an “area of interest”. This language is dismissive of Métis rights and must be corrected in future iterations of the IA Report.

Additionally, within IAAC's consideration of Project effects, there is no elaboration on the scope of these Métis rights or details on how they are affected, as is consistent with the Impact Statement itself. Instead, the Draft IA Report, in most cases, generalizes Indigenous Peoples without direct consideration of how the Project would impact Métis rights specifically. In some instances, issues or concerns the AIMC raised are notated in relevant sections, however, there is no depth to the analysis of how AIMC's rights are affected.

Overall, Métis rights are recognized legally and procedurally in the Draft IA Report but are not distinctly assessed and are primarily treated generically with a pan-Indigenous approach.

The AIMC requires that the IAAC update the IA Report to distinctly characterize and assess Métis rights.

### ***Métis Project Impact Study***

The Métis Project Impact Study identified the conversion of land from unencumbered land where Métis citizens can exercise their rights to lands with legal restrictions as a key issue. The Draft IA Report does not analyze this legal land conversion. This means that the issue of loss of accessible land for the exercise of Métis rights is not substantively assessed.

The Métis Project Impact Study also noted that Métis citizens may additionally avoid land in proximity to the Project over generations, thereby reducing the land available for the exercise of Métis rights further. This avoidance is due to increased noise, dust, workers, and a perception of contamination. This represents a functional loss of land without legal restriction. The Draft IA Report does consider sensory disturbance and reduced access as a result of the Project but there is no quantification of the extent of avoided lands or specific discussion of behavioral displacement of the Métis Community.

The Métis Project Impact Study also described concerns related to contamination; citing a mistrust of industry and potential impacts to Métis people and food sources. While the Draft IA Report does note exposure risks, there is no exploration of perception-based impacts or linkage between contamination, increased avoidance, impacts to the exercise of rights and appropriate two-eyed seeing methodology.

The AIMC requests additional engagement with IAAC to better integrate the Métis Project Impact Study into future iterations of the IA Report to ensure these items are accurately reflected and considered in the IAAC assessment of impacts to Métis rights.

### ***Terminology***

Within the Draft IA Report, Indigenous rights are a defined term; noting that Indigenous rights are "Aboriginal and/or treaty rights, as recognized and affirmed under Section 35 of the *Constitution Act, 1982*". While this is positive, there is no subsequent definition of what groups are included when the term "Indigenous Peoples" is used. This means that the Draft IA Report implies conclusions and information throughout the assessment is related to the position of the AIMC where, in many instances, this is not the case.

By using generalized language in its effects and significance determinations, the Draft IA Report, in many cases, obscures whether Métis-specific concerns were integrated, assessed, and may overstate the adequacy of the analysis and conclusions.

The AIMC requests that IAAC apply distinctions-based language throughout the next iteration of the IA Report (i.e., explicitly referencing First Nations and the Métis Community, or clearly defining "Indigenous" where it is intended to include both). The AIMC should have the opportunity to review and comment on the accuracy and appropriateness of these revisions once integrated and prior to finalization.

## **Passive Closure**

The Draft IA Report includes consideration of Passive Closure.

Passive closure (or Decommissioning Phase 2) includes long-term environmental monitoring, any required closure maintenance, and continued filling of the open-pit lake.

The duration of Passive Closure is noted to be greater than 100 years. This means that effects persist across generations, reversibility is delayed (and may be incomplete), and the AIMC has raised concerns about this extended duration, particularly related to impacts to Métis rights such as knowledge transmission and cultural continuity.

The Draft IA Report connects the long duration of Passive Closure to effects on harvesting, access to land, and land use which persist across generations and are only partially reversible (Section 4.2.2); but also, effects which may be partially irreversible such as knowledge transfer and cultural continuity.

However, there is no action proposed beyond adaptive management and no overall finding that reflects the seriousness of these extended impacts.

The AIMC requests additional engagement with IAAC on the long-term effects of Passive Closure to ensure overall findings are reflective of the extended duration and to identify appropriate mitigation measures or accommodations for impacts to Métis rights, if necessary. It is recommended that any mitigation measures identified be included as conditions of approval to ensure compliance over this extended time scale.

## **Sustainability**

IAAC's conclusions with respect to the Project's contributions to sustainability, *i.e.*, "*the ability to protect the environment*", are unsubstantiated. While the Project's primary commodities of nickel and cobalt have uses in climate-change technologies, there is no certainty to the extent of which the end-products will be used for the production of clean technologies.

In fact, the Proponent has clearly stated that the Project will contribute to the "*...critical minerals supply chain for specialty steels, aerospace, defence, batteries and advanced manufacturing.*"<sup>1</sup> A recent article from Canada Nickel Company's CEO Mark Selby, which closely follows Ontario's release of its "[Framework for the Ontario Defence Industrial Strategy](#)", highlights CNC's goals for the project as a national security asset, including "*Modern defence systems depend on secure access to strategically important minerals. Nickel is also a foundational input for specialty alloys and stainless steel, which remains critical to naval vessels, military infrastructure, armoured equipment, aerospace applications, and a range of defence manufacturing systems that require durability and corrosion resistance. This matters even more as Canada increases its defence spending, and expands domestic industrial capacity commitments.*"<sup>2</sup>

In addition, there is stated foreign interest in the Project for the purpose of strengthening processing and manufacturing capacity in the United States, including potential U.S. Defence Production Act investments. The U.S. embassy describes the Project as "*...The Crawford Nickel Project and planned midstream processing facilities in Canada are designed to produce low-carbon nickel products and intermediates for both Canadian and U.S. manufacturing, energy, and defense sectors. This model combines Canadian resource development and processing with cross-border industrial demand, strengthening supply chain*

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<sup>1</sup> <http://canada.ca/en/natural-resources-canada/news/2025/11/canada-nickels-crawford-project-referred-to-the-major-projects-office.html>

<sup>2</sup> [https://wp-canadanickel-2025.s3.ca-central-1.amazonaws.com/media/2026/05/May-25-2026\\_Selby.pdf](https://wp-canadanickel-2025.s3.ca-central-1.amazonaws.com/media/2026/05/May-25-2026_Selby.pdf)

*resilience on both sides of the border.*<sup>3</sup>

The above alludes to a focus on Project end-product uses primarily for defence applications, which would not contribute to Canada's clean growth objectives, but rather lead to quite the opposite conclusion.

The AIMC requests that IAAC revisit its analysis and conclusions with respect to the Projects contributions to sustainability, with a focus on certain outcomes rather than assumptions for end-product uses.

### **Conditions of Approval**

In conjunction with the issuance of the Draft Impact Assessment Report, the IAAC also issued *Potential Conditions established under Section 64 of the Impact Assessment Act*. The Potential Conditions will become legally binding as Conditions once the Minister decides that the designated project is unlikely to cause significant adverse effects under federal jurisdiction or determines that these effects are in the public interest.

### ***Consultation Requirements***

Within the Conditions, the definition for *Indigenous groups* includes the "Métis Nation of Ontario (Region 3)". This means the Proponent will be legally bound to future work with the AIMC, primarily through consultation on the development and implementation of various follow-up programs, particularly those required to mitigate negative project effects on Métis rights.

Given the reliance on adequate consultation with the AIMC to confirm the effective implementation of Conditions, the AIMC requires the addition of a Métis-specific consultation workplan for each condition relating to concerns raised by the AIMC, as well as resources for the AIMC to consult on and participate in the implementation of each.

### ***Reporting Requirements***

In the AIMC's experience, annual reporting frequency has not always been sufficient to ensure timely and effective implementation of mitigation measures. In some instances, impacts to Métis rights may have already occurred prior to the annual reporting and any subsequent corrective actions. The AIMC recommends that each follow-up program have a reporting requirement which aligns with the purpose and design of the program.

More frequent reporting can ensure timely and effective Agency oversight throughout all phases of the Project. Increasing reporting frequency can also help alleviate the AIMC's uncertainty or concern with respect to the ongoing Project development and potential impacts to rights. For cases where additional mitigation measures, or adaptive management plans are required, the AIMC recommends interim reporting requirements at more frequent intervals, until the additional mitigation measures are proven effective.

### ***Harvesting***

While addressed indirectly through several of the Potential Conditions, distinctions-based harvesting considerations are mostly absent from both the Draft IA Report. The word harvesting does not appear in the Potential Conditions section, and there is only one condition associated with Indigenous peoples' consumption of country foods (e.g., harvested foods), which pertains only to fish. While we understand that other harvested species and their habitats (plants, mammals, birds, etc.) are proposed to be managed under Provincial legislation, they should also be included within the Conditions to mitigate impacts to

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<sup>3</sup> <https://ca.usembassy.gov/freedom250-critical-minerals-and-mining/>

Indigenous peoples' health, since they are just as relevant as fish to the health of the AIMC. The general environmental mitigations such as surface water monitoring, dust/emission reduction practices, fish monitoring, habitat offsetting, bird best practices, and groundwater monitoring do address some environmental concerns, but may not be effective in addressing related impacts to s. 35 rights, including perception-based avoidance resulting in impacts to Métis harvesting. For example, the country foods assessment only considers two metals of concern (As, Hg) neither of them being ores, and only pertains to fish despite there being similar concerns for plant, mammal and bird harvesting. Due to the variety of ores present at the Project site, the country foods follow-up program (Condition 5.8) will not be able to address impacts from some contaminants of potential concern (Ni, Cd, Co, V).

Furthermore, as discussed above, the Métis Project Impact Study identified perception-based impacts to Métis harvesting as a result of avoidance of the Project area of influence due to environmental contamination concerns. There are currently no proposed mitigations to address perception-based impacts. The AIMC requires additional engagement with IAAC to develop mitigation measures to address these impacts.

### ***Environmental Monitoring***

Clear commitments to Métis inclusion within monitoring and follow-up programs is a corner stone of relationship and trust building that the AIMC values greatly. While Condition 8.1 outlines a plan for Indigenous Monitors, it is missing several key components that prevent it from achieving these goals with respect to the AIMC. While the AIMC will be consulted on the selection and scope of the Indigenous monitors, the condition places most of the decision-making with the Proponent and does not specifically indicate that all Indigenous groups will be treated equally in this process. The Proponent decides the hiring, the monitoring location, the type of monitoring that will be conducted, and how the monitoring will be supported. As written, the Proponent could apply a pan-Indigenous approach, with no guarantee of Métis involvement in the Indigenous monitor program. As such, this condition does not constitute a mitigation measure for impact to Métis s. 35 rights, in its current form. Including commitments for each community to have an equal share in monitoring for all stages of the Project (pending interest) would substantially reduce these concerns.

The AIMC recommends that IAAC incorporate a distinctions-based approach and equal-share requirement into the Condition 8.1.

### ***Métis Community well-being***

Another area of concern for the AIMC is the lack of concrete outcomes following the completion of the various studies and plans that are to be commissioned to address socio-economic factors like housing, employment, education, cost of living and healthcare. While the AIMC appreciates the merit of these studies and understands that these need to be quantified before they can be addressed, it is also concerned that there are no conditions proposed to directly alleviate these concerns pending the results of the studies. For example, Condition 5.6 lays out several aspects of a housing accommodation plan, however, none of these conditions relate to creating more housing to directly reduce the adverse impact on the local housing supply. The main condition in the accommodation plan is to include "*measures to cooperate with Indigenous groups and municipalities to support housing plans and initiatives intended to address workforce accommodation requirements, taking into account different workforce scenarios over the life of the Designated Project*". This is not equivalent to a commitment to reduce impacts on the housing pressures facing Indigenous communities even if the studies and plans indicate that the Project has in fact impacted the housing supply. Furthermore, it is neither Indigenous specific nor Métis specific despite Indigenous people in the region having significantly higher risks of housing instability.

### ***Proponent Commitments***

Additionally, the AIMC suggests that IAAC incorporate the commitments made by the Proponent throughout the impact assessment process, particularly with respect to the AIMC, into the IA as formal Project Conditions. This will ensure ongoing oversight and implementation of all commitments as well as the necessary engagement on these mitigation means. The Agency should require the Proponent to track and report on its progress on implementation of the commitments, in accordance with the reporting requirements for related follow-up programs.

### ***Other***

Some additional areas for consideration include ongoing consultation throughout Passive Closure, and strong commitments to AIMC inclusion throughout the full life of the Project in regards to monitoring, especially in regards to water quality, fish habitat and harvesting activities. Additionally, AIMC inclusion in the development and monitoring of heavy metals and fish habitat offsets would be valuable since it may help to alleviate AIMC concerns with the health of the fishery, and therefore address impacts to AIMC fishing rights. It is recommended these items be addressed by the IAAC in future iterations of the Conditions.

Overall, the Conditions are inclusive of many of the areas of concern previously raised by the AIMC and sufficiently require involvement of the AIMC in follow-up and monitoring programs. However, significant outstanding issues include a lack of a distinctions-based approach capable of addressing impacts to Métis rights, and insufficient consultation and reporting requirements. With the Agency's incorporation of the above comments, detailed further in Appendix "C", the AIMC is of the opinion that the Conditions may effectively mitigate some impacts to its s. 35 rights.

### **Closing**

*Marsi* for the opportunity to comment on the Draft IA Report and Potential Conditions. The AIMC has provided extensive information on the AIMC's rights and perspectives to IAAC and the Proponent throughout the impact assessment process. While some of this information has been incorporated into the Draft IA Report, significant impacts to Métis s. 35 rights remain unaddressed at this time. The AIMC requests that the information and comments summarized above and detailed in the attached Appendices be substantively addressed by IAAC, prior to conclusion of the impact assessment.

We trust that the AIMC's comments in this letter will be seriously considered by IAAC to support the protection of the AIMC's rights for future generations. We look forward to meeting with you to discuss these comments and concerns further.

Sincerely,

<Original signed by>

Jacques Picotte

Regional Councillor for the Abitibi Inland Métis Community and Chair of the MNO Region 3 Consultation Committee

cc MNO Region 3 Consultation Committee officials:

Laurette McKnight, President, Timiskaming Métis Council

David Hamilton, President, Chapleau Métis Council

Pierre Lefebvre, President Timmins Métis Council

Douglas Hull, President, Northern Lights Métis Council

Andre Lefebvre, Captain of the Hunt for the Abitibi Inland Métis Community

**APPENDIX A: Draft IA Report Comments – Comparison with Previously Raised Concerns**

#	Previously Raised Concerns	Comment Reference	Included in Draft IA Report (Y/N/P [Partial])	AIMC MNO R3CC Specific (Y/N/P [Partial])	Details from Draft IA Report	Notes
1.	Recognition of Métis Rights and Interests	Sept. 2025 Comment #1	Y	Y	Section 4.3 subsection <i>Métis Nation of Ontario – Region 3</i> includes recognition of Métis Section-35 harvesting rights (i.e., hunting, trapping, plant gathering, and fishing). Further, it notes cultural continuity and governance; as well as connection to land in a general sense. Throughout the Draft IA Report, the AIMC MNO R3CC is noted as a rights holder, a participant in consultation and notes some specific concerns.	While there is recognition of Métis rights, there is a lack of depth in analysis of specific impacts to those rights. It is recommended that the IAAC work with the AIMC to adequately analyze specific impacts to Métis rights.
2.	Consideration of the full scope of Métis rights, specifically connected to Cumulative Effects	MNO 001, MNO 027, MNO 028, Sept. 2025 Letter, Sept. 2025 Comment #7	Y	N	Section 1.2.1 Effects Assessment includes only generic reference to Indigenous Peoples in terms of effects and does not differentiate between First Nation and Métis. Section 4.2 Effects on Indigenous Peoples has no Métis-specific indicators.	The Draft IA Report does not include specific rights characterization for AIMC. This is carried forward from the Impact Statement. A full consideration of the scope of Métis rights is outstanding. It is recommended that the IAAC collaborate with the AIMC to characterize

3.	Consideration of the full scope of Métis rights, specifically connected to Fish Health	MNO 015, Sept. 2025 Comment #10	Y	N	<p>Section 2.1 notes that the Project is likely to cause residual adverse effects to fish and fish habitat through habitat loss from overprinting, habitat alteration from changes to surface water flows, changes to the health of fish from changes to water quality, and the risk of injury or mortality during major dewatering activities. Further, these impacts are noted to be significant to a moderate extent.</p> <p>This is connected to Indigenous rights in Section 4.2.2 which notes Indigenous land users will be deterred from fishing due to concerns related to fish health and contamination concerns. It is further connected through Section 4.2.3 Health (Country Foods).</p>	<p>specific Métis rights.</p> <p>Fish health is addressed in detail within the Draft IA Report. It is clearly linked to Indigenous rights through fishing practices, country foods, health impacts and the overall rights assessment framework.</p> <p>However, there is no Métis specific analysis. It is recommended that the IAAC update the IA Report to include specific analysis of fish health in relation to Métis rights.</p>
4.	Integration of Métis rights from MNO Project Impact Study; Lack of Confirmation of Information Included from MNO Project Impact Study	MNO 002, MNO 023, Sept. 2025 Letter, Sept. 2025 Comment #2	Y	P	<p>Section 4.1.3 <i>Indigenous Knowledge</i> Provided includes specific reference to the Métis Project Impact Study and notes that it was submitted in confidence to the IAAC.</p> <p>Within the same Section it is noted that information provided through this and other Indigenous group's studies were incorporated in the proponent's Impact Statement and subsequently considered in this report.</p>	<p>While the Métis Project Impact Study is noted as informing the Draft IA Report, there are no explicit references across key sections, no citations or references to the Métis Project Impact Study, and no Métis-specific findings.</p> <p>In contrast, the Draft IA Report includes a co-drafted Analysis for Apitipi Anicinapek Nation.</p> <p>The main impacts noted</p>

						<p>in the Métis Project Impact Study include Loss of Access to Lands, Legal Restriction on Harvesting Rights and explicitly notes a need for direct and proportional accommodation.</p> <p>The Draft IA Report does not analyze legal land conversion and does not identify proportional accommodation measures.</p> <p>It is recommended that the IAAC revise the IA Report to specifically reference the Métis Project Impact Study, describe and consider the main impacts from this Study, and discuss direct and proportional mitigation/accommodation with the AIMC.</p>
5.	Consideration of secondary ores and their processing requirements	MNO 003	P	N	<p>The Draft IA Report discusses processing ores in general terms. Section 1.1 does note that the Project will produce nickel and notes that magnetite concentrate, cobalt, platinum, palladium, and chromium will also be recovered.</p>	<p>The Draft IA Report does not assess between the different primary or secondary or sulphide and silicate ores or their impacts but combines them together throughout the IA Report; nor does it describe any secondary ore streams, processing,</p>

6.	Inadequate Consultation; Meaningfulness of Consultation	MNO 005, Sept. 2025 Comment #3	P	Y	<p>Consultation with the AIMC MNO R3CC by the IAAC is noted in Section 4.1.1.</p> <p>Proponent led engagement is described in Section 4.1.2 as beginning as early as 2021. This Section includes specific details on funding provided to AIMC MNO R3CC.</p> <p>Section 4.1.3 indicates that the AIMC MNO R3CC provided an Impact Study; illustrating that Métis input was provided.</p> <p>Overall, the Draft IA Report illustrates responsiveness by the IAAC and the Proponent and overall procedural adequacy; but does not explicitly indicate whether consultation was sufficient or whether the duty to consult was met for Métis.</p>	<p>or specific metallurgical requirements.</p> <p>There are no details on processing streams for different ores nor their unique impacts to rights.</p> <p>It is recommended that the IAAC revise the IA Report to include analysis and discussion of processing streams for different ores based on federal expertise.</p>
					<p>The Draft IA Report identifies the AIMC as a rights holder, notes that they were consulted, identifies they were funded and engaged in studies. This is identified as being consistent with meaningful consultation.</p> <p>However, while it is noted that Métis input was provided to the Proponent and IAAC through the Métis Project Impact Study, there is no identification of whether the concerns and impacts noted in the Impact Study were resolved/addressed.</p> <p>It is recommended that the IAAC directly consult</p>	

						<p>the AIMC to identify outstanding concerns and address those concerns prior to Project approval.</p>
7.	<p>Inadequate Consideration of Métis Health</p>	MNO 006	Y	P	<p>Section 4.2.3 includes identification of residual adverse effects to health due to changes in the quality of harvested fish for consumption and changes to atmospheric conditions. Further, in Country Foods, it is noted that changes to country foods, particularly fish, may affect the health conditions of Indigenous Peoples.</p> <p>There is further discussion of how Indigenous communities may experience greater impacts due to social determinants of health.</p> <p>Métis-specific health is noted in relation to fish contamination, bioaccumulation risks, and dietary exposure.</p>	<p>Overall, the health assessment is largely generic and is framed around Indigenous Peoples in general, with no separation between First Nations and Métis.</p> <p>There are no Métis-specific health pathways and no Métis specific impact characterization.</p> <p>It is recommended that the IAAC update the IA Report to include Métis-specific health pathways and Métis specific impact characterizations.</p>
8.	<p>Request for Joint Health and Safety Committee</p>	MNO 006	N	N		<p>The Draft IA Report does not include any details related to the AIMC's request for a Joint Health and Safety Committee.</p> <p>It is recommended that the IAAC include the requirement for a Joint Health and Safety Committee as a condition of approval.</p>

9.	Distinction-based Language; Lack of Reference to Métis as "Indigenous Nation" and Lack of Inclusion of Métis in references to "Indigenous peoples"	MNO 007, MNO 009	Y	P	<p>There is no specific definition statement that includes Métis as part of Indigenous Peoples.</p> <p>Métis perspectives are recorded (e.g., Page 104-107), but the integration of Métis specific details are not used in an identifiable way to reach conclusions.</p>	<p>The Draft IA Report recognizes Métis as a distinct Indigenous rights holder but does not consistently apply distinctions-based language or analysis. This means there is a lack of traceability of Métis input in the Draft IA Report.</p> <p>It is recommended that the IA Report be updated to consistently apply distinctions-based language. This can align with the definition used in the potential conditions which can then be carried through the IA Report.</p>
10.	Lack of Information related to Critical Minerals	MNO 009	P	N	<p>Section 1.1 <i>Project Description</i> does include a limited reference to critical minerals.</p>	<p>The information contained within the document is contextual only.</p> <p>While the Project is a nickel mining project, it does not explicitly state that it is a Critical Mineral and does not link any regulatory progression to the Critical Mineral designation and secondary ores.</p> <p>It is recommended that the IAAC update the IA Report to include the</p>

							regulatory progression for Critical Minerals based on federal expertise.
11.	Lack of Inclusion of Métis in specified Opportunities	MNO 010	Y	N		Section 4.2.4 includes specific reference to involvement of Indigenous communities in employment, contracting, procurement, and economic participation.	There are no specific references to Métis inclusion in these opportunities. It is recommended that the IAAC consult with the AIMC on potential opportunities to ensure understanding and parity of involvement.
12.	Lack of Inclusion in Monitoring and Follow-up Programs	MNO 016, Sept. 2025 Comment #6	Y	Y		The Draft IA Report indicated that Indigenous groups will be a part of mitigation and follow-up programs. The consultation summary table on Page 169 (row 25) notes that the AIMC MNO R3CC expressed the need for involvement in follow-up and monitoring programs. In response, IAAC recommends that follow-up programs be developed in consultation with Indigenous communities.	While Indigenous involvement in general is noted, specific involvement of the AIMC is not specified. This is also noted in the Potential Conditions as a legally binding requirement. It is recommended that the IA Report be updated to include distinctions-based language to ensure Métis involvement.
13.	Post-Approval Engagement and Impact Benefit Agreement Negotiation	MNO 019, MNO 026	Y	N		The Draft IA Report notes that there will be ongoing engagement and consultation with local Indigenous Nations prior to construction, throughout the operations and closure phases and that there will be	There are no specific references to Métis-specific post-approval engagement commitments and no description of Impact

					participation by these Indigenous groups in follow-up programs and monitoring.	Benefit Agreements (IBA) or equivalent noted. An IBA should be negotiated prior to construction to ensure that consultation aligns with AIMC Consultation Framework. All conditions imposed by IAAC should be included in the IBA.
14.	Involvement in Working Group	MNO 020	Y	N	Main reference to technical working groups is noted in Annex 4, Table 21, and Section 4.1.1 (IAAC-led consultation and engagement), specifically in relation to working with Indigenous communities to establish a technical working group.	The Draft IA Report does not identify Métis-specific involvement in the working groups. However, Métis involvement is not precluded and may be confirmed through the Potential Conditions. This commitment must be tracked by IAAC in the post-approval phases to ensure compliance with regards to Métis involvement.
15.	Scope of DE&I Parameters	MNO 021	Y	P	DE&I is noted in the Draft IA Report and is formally applied in the assessment. The AIMC MNO R3CC was noted as raising this issue for consideration. Across the Draft IA Report, GBA+ is applied to Indigenous Peoples but there is no segmentation by Indigenous groups.	While the Draft IA Report does consider key equity factors such as gender, age, vulnerability, and social determinants, there is no consideration of Métis-specific constraints such as dispersed population, lack of land base, governance/service delivery differences or

16.	Conflation of Consultation with Accommodation	MNO 022	Y	Y		<p>consideration of Métis-specific land use patterns. Further, the GBA+ considerations do not consider how Métis avoidance behavior varies from other Indigenous rights holders or non-Indigenous land-users. It is recommended that the IA Report be updated to include discussion of key Métis-specific constraints that disproportionately impact the Métis community, particularly to 2-spirit, women, girls and non-binary citizens.</p>
					<p>The Consultation Issues Table, across multiple rows, identifies Métis-specific concerns such as health risks, environmental impacts, and requests for greater involvement. The IAAC response in these rows often identifies continued proponent or IAAC engagement as responses to the Métis-specific concerns without demonstration of how the impacts are avoided, reduced, or offset; or without linking to specific mitigation measures.</p>	<p>The Draft IA Report frequently treats consultation activities (e.g., information sharing or participation) as sufficient response to identified impacts rather than demonstrating clear and proportional accommodation for identified impacts. It is recommended that the IAAC continues consultation with the AIMC to discuss proportional</p>

17.	Magnitude and Extent of Groundwater and Surface Water Changes	MNO 029, Sept. 2025 Comment #9	Y	N	The Draft IA Report frames impacts to groundwater and surface water as low to moderate in magnitude and localized following mitigation. Effects to groundwater and surface water are generally concluded to be not significant.	accommodation for any identified impacts to Métis rights (e.g., based on the Métis Project Impact Study).
18.	Impact of Effluent Discharges	MNO 029	P	N	Section 2.1 (Surface Water/Hydrology) notes potential changes to surface water quality, runoff and sedimentation, and site water management which include pathways where effluent discharge could occur. Water management and contamination are consistently described as following regulatory thresholds. Within the Health Section (Page 77-78) notes contaminant exposure pathways including through water.	The Draft IA Report does not identify Métis-specific specific methodology and monitoring concerns nor the necessity to change groundwater pH to trigger carbon sequestration.
						Like the Impact Statement, there is no direct discussion of effluent discharge as an impact pathway or in-depth discussion of discharge sources. As with the Impact Statement, there is no assessment of downstream transport of effluent or consideration of accumulation or dispersion. Downstream historic communities, trading posts, and routes are located throughout the proposed area. It is recommended that the IAAC update the IA Report to include the above noted details

19.	Cumulative Effects on Fish Habitat and Health; Long-term Viability of Populations	MNO 030, Sept. 2025 Letter, Sept. 2025 Comment #14	Y	N	<p>The Draft IA Report acknowledges direct loss of fish habitat and indirect changes through sedimentation, water quality alteration, and hydrological change. These are noted as contributors to cumulative effects.</p> <p>Cumulative effects to fish and fish habitat are noted as low to moderate following mitigation and offsetting.</p>	<p>based on federal expertise.</p>
					<p>It should be noted that residual effects to fish and fish habitat from the project are identified as significant to a moderate extent due to amount of habitat loss, technical feasibility of proposed offsets, and extent of water quality changes.</p> <p>It is unclear how the questionable technical feasibility of offsets can contribute to a moderate rating for project effects but result in an overall reduction (to low) at a cumulative scale.</p> <p>It is recommended that the IAAC provide specific details in the IA Report and in a response to AIMC on how this determination was reached and incorporates AIMC's concerns.</p>	
20.	Duration of Passive Closure	MNO 031, Sept. 2025 Comment #11	Y	P	<p>The Draft IA Report acknowledges and contextualizes the long duration of passive closure (&gt;100 years) and details Indigenous community concerns about the duration.</p>	<p>While the concern with the duration is noted, there is limited discussion on what this means or the applicability of the proposed approach.</p>

21.	Long Term Impacts of Leaching from Tailings Management Facility	MNO 031	Y	N	<p>The Draft IA Report includes details about the long-term impacts of leaching including metal leaching/ARD and seepage (Section 2.1, Page 18-20). Seepage is noted to be expected from the tailings management facility and impoundment facility during operations and decommissioning (Section 2.1, Page 22-24).</p> <p>The IAAC notes uncertainties in geochemical characterization and source-term modelling which will require ongoing monitoring. Further, Ontario and Natural Resources Canada are concerned that the proponent has underestimated the extent of seepage.</p>	<p>Instead, it is characterized as delayed or includes partial reversibility and does not include appropriate methodology for containment of contaminants in open air, in a lake setting for &gt;100 years.</p> <p>It is recommended that the IAAC provide specific details in the IA Report and in a response to AIMC on how the extended duration of passive closure may impact Indigenous use generationally.</p>
						<p>Overall, the Draft IA Report demonstrates that long-term leaching is not resolved at the assessment phase and will require adaptive management and contingency measures; with residual risk remaining. Heavy metal leaching methodology must be appropriate (e.g., Cd, Ni, Co all valences; detection to ppt).</p> <p>Long-term monitoring of seepage must be tracked by the IAAC in post-</p>

22.	Permanent Alteration of Travel Routes	MNO 031	Y	N	Section 4.2.1 includes consideration of transportation routes of cultural significance, and access restrictions. Section 4.2.2 discusses effects on movement and access and changes to overall experience.	approval phases to ensure compliance and with regards to Métis involvement in the long-term monitoring program.  No Sections within the Draft IA Report specifically identify analysis of Métis travel routes or analysis of permanent alteration of these routes.  It is recommended that the IAAC update the IA Report with specific consideration of Métis travel routes and how permanent alteration may impact the exercise of Métis rights.
23.	Cumulative Effects of Forestry Activity	MNO 032	Y	N	The Draft IA Report acknowledged forestry activity as part of the cumulative effects assessment in multiple sections. For example, cumulative effects on fish and fish habitat include consideration of forest management activities (Page 26-27) and Section 4.2.2 <i>Current Use of Lands and Resources</i> notes that forestry contributes to additive pressure on land use, harvesting, and Indigenous Knowledge.	The Draft IA Report does not identify Métis-specific concerns nor Valued Ecological Importance. Monitoring to assess cumulative effects must include all heavy metals and appropriate methodology (e.g., Cd, Ni, Co all valences; detection to ppt).
24.	Lack of Inclusion of Past Forestry Activity in	MNO 032	Y	N	The Draft IA Report includes discussion of past forestry activity	The Draft IA Report does not identify Métis-specific

	Assessment				within cumulative effects analysis.	specific concerns nor Valued Ecological Importance nor additional pressures on impacts to rights.
25.	Lack of Consideration of Cultural Value and how this Influences Impacts	MNO 033	Y	N	The Draft IA includes broad definition of cultural and land-based values (e.g., Section 4.2.1) generalized for Indigenous Peoples.	The Draft IA Report does not undertake analysis of Métis-specific cultural impacts. It is recommended that the IAAC update the IA Report to complete an analysis of Métis-specific cultural impacts.
26.	Incongruent findings between Closure Phase and Construction/Operations	MNO 033	Y	N	Construction and operations phase effects are typically described as reversible with mitigation, whereas, in the closure phase, recovery is delayed for >100 years and full hydrological recovery may not occur until over 100 years after active closure (Section 2.1). Further, in construction and operations it is noted that a “net habitat” gain will occur from fish habitat offsetting; however, within the closure phase it is noted that offsetting would not occur within the same time span as when the habitat is lost delaying reversibility for an extended time.	The Draft IA includes various incongruent or partially inconsistent findings. It is recommended that the IA Report be updated to ensure findings between the construction, operations, and closure phase are consistent across phases and in alignment.
27.	Vegetation, Riparian, and Wetland Environments; Lack of Detail on	MNO 034	Y	N	The Draft IA Report includes details on improving habitats across multiple sections framed as mitigation,	The Draft IA Report does not identify Métis-specific concerns and mitigations nor what

	Improving Habitats					offsetting, or follow-up measures.	AIMC considers "improved".
28.	Lack of Consideration of Climate Change in Impact Statement	MNO 035, Sept. 2025 Comment #15	P	N		The Draft IA Report does include consideration of climate change, however, the scope is limited and focuses mainly on greenhouse gas emissions, carbon storage via peatlands, and Canada's climate commitments.	It is noted that greenhouse gas emissions are not considered effects within federal jurisdiction and are therefore not assessed within the Impact Assessment, however, ultramafic carbon sequestration are included as Federal mitigation and must be assessed. Hydrogen is not included in IA.
29.	Lack of Consideration of Climate Change in Revegetation Plan	MNO 035	N	N			The Draft IA Report does not explicitly link revegetation and climate change. Revegetation is typically noted as a site-specific ecological mitigation measure (Section 1.1, 2.1, 2.3, 4.2.2) and not a climate adaptation or resilience strategy. It is recommended that the IAAC update the IA Report to include consideration of revegetation planning in relation to climate change.

30.	Lack of Contingency Planning related to Proposed Carbon Sequestration	MNO 035	N	N		<p>Carbon sequestration is noted only as a potential mitigation measure (Section 6) and is described as conceptual rather than a fully developed design element.</p> <p>This contrasts with other project effects such as tailings seepage which includes more practical contingency measures such as pump-back wells or barriers.</p> <p>It is recommended that the IAAC require additional mitigation or apply conditions of approval to supplement the conceptual carbon sequestration. The current conceptual technology involves a change in groundwater pH which must also be addressed. Hydrogen is not included in IA.</p>
31.	Lack of Consideration of Disproportionate Impacts to Métis from influx of External Workers	MNO 036	P	N	Section 4.2.3 includes consideration of the workforce at a general level, including potential socio-economic effects.	<p>The Draft IA Report does not include whether Métis will experience a disproportionate impact from an influx of workers or analyze the impacts to Métis community</p>

32.	Lack of Consideration of Disproportionate Impacts to Métis from Increased Demand for Services and Infrastructure	MNO 037, Sept. 2025 Comment #16, #17	P	N	The Draft IA Report (Section 4.2.3) considers the increase in demand for services and infrastructure at a general level and addresses changes to community well-being, and pressure on services and infrastructure. This is linked to the health conditions of Indigenous Peoples.	<p>cohesion, cultural safety, housing, financial inequality, or access.</p> <p>It is recommended that the IAAC update the IA Report to include specific consideration of how Métis will be impacted by the influx of workers and analyze impacts to Métis community cohesion, cultural safety, and access.</p>
						<p>The Draft IA Report does not analyze demand for services and infrastructure as a distinct Métis-related impact pathway.</p> <p>While the Potential Conditions also include development of an accommodation plan for housing, this is not appropriately connected to the IA Report, nor include short-term safe housing.</p> <p>It is recommended that the IAAC update the IA Report to include specific consideration of demand for services and infrastructure as a distinct Métis-related impact</p>

33.	Lack of Consideration of Increased Safety Risks to Métis Citizens, in Particular, Métis Women, Girls, or Two-Spirit, from the Project	MNO 038, Sept. 2025 Comment #17	P	N	The Draft IA Report (Section 4.2.3) includes consideration of health, social conditions, and economic effects.	pathway. There is no mention in the Draft IA Report of Métis women, girls, or two-spirit individuals and it does not include analysis of gender specific safety risks, increased risk of violence or harassment, or safety implications from camps or workforce. It does not include short-term safe housing, affordable housing, nor additional health and education pressures. It is recommended that the IAAC update the IA Report to include specific analysis of gender specific risks for Métis citizens.
34.	Lack of Consideration of Increased Racism or Discrimination in Interactions with the Transient Workforce	MNO 038	P	N	See Comment #33	See Comment #33
35.	Changes in Métis Land Use or Contamination of Traditional Food Sources Affecting Food Security and Dietary Habits	MNO 039, Sept. 2025 Comment #19	Y	P	The Draft IA Report (Section 4.2.3) includes detailed consideration of contamination of traditional food sources and the implications of this on food security, health, and dietary habits of Indigenous Peoples.	Specific concerns of the AIMC are noted in relation to mercury and (some) heavy metal biomagnification and fish contamination. However, impacts are not

36.	Increased Economic Strain from Changes to Traditional Food Sources	MNO 039	Y	P	The Draft IA Report (Section 4.2.3) notes that the quality of country foods could affect the health conditions of Indigenous Peoples through consumption.	<p>differentiated as Métis-specific dietary considerations.</p> <p>It is recommended that the IAAC update the IA Report to differentiate specific Métis dietary considerations and include all heavy metals of concern to AIMC and appropriate methodology (e.g., Cd, Ni, Co all valences; detection to ppt) including collaboration with Health Canada.</p>
					<p>There is no consideration of increased costs, economic burden or loss of subsistence value for Métis harvesters, their families, and their community.</p> <p>It is recommended that the IAAC update the IA Report to include consideration of increased costs, economic burden, and loss of subsistence value for Métis harvesters to ensure a fulsome consideration of impacts to Métis rights.</p>	

37.	Bioaccumulation of Contaminants (e.g., Mercury and Arsenic)	MNO 040	Y	Y	<p>The Draft IA Report (Section 4.2.3, Country Foods Subsection) includes details on bioaccumulation or methylmercury and arsenic and the potential for bioaccumulation in typically harvested fish such as sturgeon, walleye, and northern pike.</p> <p>There is also discussion in this section of biomagnification affecting larger bodied fish that are consumed by Indigenous Peoples.</p> <p>The effects are linked in Section 2.1 to effluent discharge and seepage.</p> <p>It should be noted that the existing mercury levels in fish within the LSA already exceed safe consumption levels.</p>	<p>AIMC concerns and perspectives related to bioaccumulation and biomagnification are noted in Section 4.2.3. (Appropriate methodology (e.g., Cd, Ni, Co all valences; detection to ppt), monitoring heavy metals, health, impacts to rights).</p>
38.	Changes in Métis Citizen Perception of Food Safety	MNO 040, Sept. 2025 Comment #20	Y	N	<p>The Draft IA Report (Section 4.2.3) includes indirect evidence that perception of food safety may change based on contamination concerns and avoidance of traditional foods.</p>	<p>The Draft IA Report does not include a distinct analysis of changes in Métis perceptions related to food safety.</p> <p>It is recommended that the IAAC update the IA Report to include consideration of changes in Métis perceptions to food safety to ensure a fulsome consideration of Métis rights.</p>
39.	Unequal Distribution of Project Benefits	MNO 041	P	N	<p>Within Section 4.2.3 the Draft IA Report notes employment opportunities, economic activity, and</p>	<p>The Draft IA Report does not consider socio-economic benefits</p>

40.	Lack of Métis Specific References in Emergency Response Planning	MNO 042	N	P	community well-being.	<p>analyzed by group and there is no evaluation of whether benefits are distributed equally.</p> <p>It is recommended that the IAAC update the IA Report to include analysis of whether economic benefits are distributed equitably, including analysis concerning 2-spirit, women and non-binary citizens.</p>
						<p>There is no section in the Draft IA Report which outlines an emergency response plan in detail or describes community-specific response protocols.</p> <p>The Potential Conditions do require development of an accidents and malfunctions prevention and response plan in relation to each phase of the project and in consultation with the AIMC.</p> <p>This commitment must be tracked by the IAAC in post-approval phases to ensure compliance with regards to Métis</p>

41.	Lack of Clarity on MNO Involvement in Monitoring	MNO 044	Y	N	The Draft IA Report (Section 4.1.1) includes general reference to Indigenous participation in monitoring, follow-up, and adaptive management frameworks.	involvement.
<p>There is no specific reference to Métis-specific monitoring, capacity for participation in monitoring or ongoing integration of Indigenous knowledge into monitoring.</p> <p>Additional discussion is required with the IAAC on availability of capacity funding for ongoing monitoring programs, appropriate methodologies (e.g., detection limits), sample sites, and post-approval phase workplans.</p>						

## APPENDIX B: Draft IA Report Comments – Additional Technical Review

#	Reference	Details from the Draft IA Report	AIMC Comment
1	<p>S. 2.1 Fish and fish habitat. S.s. Cumulative effects, p. 26.</p> <p>Inaccuracy as it relates to Bradshaw Project operations</p>	<p>The Draft IA Report states that the Bradshaw Project is “currently in care and maintenance mode”, it is expected to restart with an eight-year lifespan that would “likely overlap” with this project’s effluent discharge into the same river. In addition, it notes that the proponent “would need to account” for these cumulative conditions when developing receiver-based effluent criteria and effluent-management strategies for future Environmental Compliance Approvals.</p>	<p>The Bradshaw Project is currently an active mine and is discharging effluent in the same river. The proponent needs to account for this. The use of the term “likely overlap” gives sense that it may not overlap but they certainly will if effluent is being discharged contemporaneously by both companies in the same river at different locations. Cumulative effect assessment must include heavy metals of concern to AIMC in effluent and use of appropriate methodologies (e.g., Cd, Ni, Co all valences; detection to ppt; specific to fish).</p>
2	<p>S. 7 Extent to which project effects contribute to sustainability, p. 119</p> <p>Lack of certainty as it relates to project success</p>	<p>The Draft IA Report states that the project is “likely” to strengthen Canada’s critical mineral production and economy but would also result in adverse effects for Indigenous Peoples.</p>	<p>This demonstrates a lack of certainty as it relates to project success. While the projects effects are likely to strengthen Canada’s critical mineral production and support long-term economic resilience for current generations does not mean that it actually will (e.g., fluctuation in market, new technologies, lack of capital investment). What is certain is that there will adverse effects to Indigenous Peoples. Fluctuations in commodity prices may create uneven outcomes over the project’s lifespan where some of the adverse effects of the project remain while the economic benefits to well-being are not realized.</p> <p>For this reason, an accommodation agreement with the AIMC must be established with conditions that would allow for compensation if the economic benefits are not realized.</p>

<p>3</p>	<p>S. 7 Extent to which project effects contribute to sustainability, p. 124-126</p>	<p>“Sustainability is defined in the IAA to mean <b>“the ability to protect the environment [emphasis added], contribute to the social and economic well-being of the people of Canada and preserve their health in a manner that benefits present and future generations.”</b></p> <p>and</p> <p>“The project’s two primary products (nickel and cobalt) have been identified as priorities to spur Canada’s economic growth and are necessary inputs for priority supply chains, including clean technologies, as laid out in the Canadian Critical Minerals Strategy.”</p> <p>and</p> <p>“The project effects strengthen Canada’s role in critical mineral production which would support long-term economic resilience for current and future generations.”</p>	<p>IAAC conclusions with respect to the Project’s contributions to sustainability, i.e., <i>“the ability to protect the environment”</i>, are unsubstantiated. While the projects primary products of nickel and cobalt have uses in many technologies, there is no certainty that end-products would be used for production of “clean technologies” or to what extent. Note that “clean technology” is not a descriptive, useful, technical term and may be deemed inappropriate within the IA.</p> <p>In fact, the Proponent has clearly stated that the Project will contribute to the “...critical minerals supply chain for specialty steels, aerospace, defence, batteries and advanced manufacturing.”<sup>4</sup> A recent article from Canada Nickel Company’s CEO Mark Selby, which closely follows Ontario’s release of its <a href="#">“Framework for the Ontario Defence Industrial Strategy”</a>, highlights CNC’s goals for the project as a national security asset, including “Modern defence systems depend on secure access to strategically important minerals. Nickel is also a foundational input for specialty alloys and stainless steel, which remains critical to naval vessels, military infrastructure, armoured equipment, aerospace applications, and a range of defence manufacturing systems that require durability and corrosion resistance. This matters even more as Canada increases its defence spending, and expands domestic industrial capacity commitments.”<sup>5</sup></p> <p>In addition, there is stated foreign interest in the Project for the purpose of strengthening processing and manufacturing capacity in the United States, including potential U.S. Defence Production Act investments. The U.S. embassy describes the Project</p>
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<sup>4</sup> <http://canada.ca/en/natural-resources-canada/news/2025/11/canada-nickels-crawford-project-referred-to-the-major-projects-office.html>

<sup>5</sup> [https://wp-canadanickel-2025.s3.ca-central-1.amazonaws.com/media/2026/05/May-25-2026\\_Selby.pdf](https://wp-canadanickel-2025.s3.ca-central-1.amazonaws.com/media/2026/05/May-25-2026_Selby.pdf)

			<p>as “... The Crawford Nickel Project and planned midstream processing facilities in Canada are designed to produce low-carbon nickel products and intermediates for both Canadian and U.S. manufacturing, energy, and defense sectors. This model combines Canadian resource development and processing with cross-border industrial demand, strengthening supply chain resilience on both sides of the border.”<sup>6</sup></p> <p>The above alludes to a focus on Project end-product uses primarily for defence applications, which would not contribute to Canada’s clean growth objectives, but rather lead to quite the opposite conclusion.</p> <p>The AIMC requests that IAAC revisit its analysis and conclusions with respect to the Projects contributions to sustainability, with a focus on certain outcomes rather than assumptions for end-product uses.</p>
4	<p>S. 4 Impacts on Indigenous Peoples and their exercise of rights, S.s. 4.2.3 Effects on the health, social, and economic conditions of Indigenous Peoples, p.75-76.</p>	<p>“The project is likely to affect Indigenous health through potential consumption of contaminated fish (e.g., mercury, arsenic) harvested downstream near the project in the North Driftwood River and West Buskegau River. Effects to Indigenous health may also occur through changes to the atmospheric environment, primarily through exposure to airborne contaminants where land is used near and adjacent to the project and for longer periods of time.”</p>	<p>While IAAC assessed the effects to Indigenous Peoples health from the consumption of contaminated fish from bioaccumulation of mercury and arsenic, it neglects to discuss or assess the potential uptake and relative toxicity in harvested country foods of other heavy metals in the Project ores including <b>nickel, cadmium and cobalt</b>. The effects of these heavy metals to the environment are not well known, studied or well-regulated, in particular to Métis health.</p> <p>For several years, the Métis Nation of Ontario has raised similar concerns with Health Canada, and recommended that the Existing Substances Risk Assessment Bureau and the Métis collaborate to prioritize the study and monitoring of these heavy</p>

<sup>6</sup> <https://ca.usembassy.gov/freedom250-critical-minerals-and-mining/>

			<p>metals due to their toxicity.</p> <p>Additionally, it is unclear why other Métis valued components are excluded from the assessment of effects to Indigenous Peoples health. For example, the AIMC identified harvesting of plants and fungi such as cranberry, ferns, wild rice, medicinal plants, berries, and mushrooms, in proximity to the Project Area and particularly focussed along historic waterways including the North Driftwood River, West Muskegou River, Frederick House River, Abitibi River, Mattagami River, and the Jocko Creek Watershed. Plant and fungi harvesting in proximity to these waterways could result in negative effects to Métis citizen health from consumption, through uptake of heavy metals, particularly downstream of proposed effluent discharge points.</p> <p>Similar concerns related to the consumption of harvested terrestrial wildlife (e.g., moose, small game, waterfowl) within the North Driftwood Watershed and the West Muskegou River, especially downstream of effluent discharge locations, remain unaddressed.</p> <p>The AIMC recommends that IAAC expand its assessment to include heavy metals in Project ores such as nickel, cadmium and cobalt. The assessment should consider heavy metal uptake in vegetation and fungi at ppt detection limits, and focus on areas downstream of final discharge locations within the affected watershed. The assessment should consider the potential toxicity of terrestrial wildlife, vegetation, and fungi relative to human consumption.</p>
5	S. 4 Impacts on Indigenous Peoples and their exercise	"MNR and MECP identified the potential for mercury methylation associated with elevated	Given the existing mercury levels in fish within the LSA exceed safe consumption thresholds, it is clear that

<p>of rights, S. s. 4.2.3 Effects on the health, social, and economic conditions of Indigenous Peoples, p. 75</p>	<p>sulfate levels from project discharges in these waterbodies. IAAC understands that existing mercury levels in fish within the LSA exceed safe consumption thresholds, and that no advisories were in place in the area at the time of writing.”</p> <p>“IAAC is of the view that the proponent’s water management and treatment systems, combined with regulatory oversight and monitoring requirements (Table 9), would limit potential contaminant releases to the receiving environment and provide mechanisms to detect and respond to changes in mercury or methylmercury concentrations.”</p> <p>“Additionally, IAAC recommends water quality monitoring for other contaminants of potential concern, such as sulphates and tungsten (see Tables 4 and 9) against the Provincial Water Quality Objectives or other thresholds determined with other relevant authorities.”</p>	<p>previous regulatory oversight and monitoring was not effective in preventing impacts to fish and fish habitat. The AIMC is concerned that existing MeHg levels combined with the Project activities will result in long-term adverse impacts to fish and fish habitat, downstream ecosystems, and ultimately s. 35 rights, which cannot be adequately mitigated through the proposed mechanisms.</p> <p>It is not clear why IAAC’s recommendation focusses solely on sulphates and tungsten, and does not include other heavy metals known to be within the Project ores (see also Comment #4). Additionally, the Provincial Water Quality Objectives do not contain appropriate thresholds for human consumption for some heavy metals including nickel, cadmium and cobalt.</p> <p>The elevated MeHg and mercury levels in fish within the LSA clearly demonstrates the necessity for collaboration between the AIMC and regulators on other heavy-metal contaminants, including Cd, Ni, Co.</p> <p>The AIMC recommends the water quality monitoring follow-up program include requirements for heavy-metal monitoring as contaminants of potential concern.</p>
<p>6 S.s. 4.2.2 Effects on the current use of lands and resources for traditional purposes by Indigenous Peoples, S.ss. Hunting and trapping. P. 62</p>	<p>“This includes a 222-hectare reduction in late wintering moose habitat”</p> <p>“Habitat fragmentation from forest clearing is expected to result in habitat loss and interruption of migratory routes. This would change the availability of furbearers (e.g., mink and lynx) and moose at preferred hunting and trapping locations near the project. Indigenous communities have identified hunting furbearers and moose as critical for</p>	<p>AIMC remain concerned about impacts to the moose population as a result of the Project, including from habitat loss and fragmentation, air quality, water quality and sensory disturbance affecting habitat quality, calving, and increased harvesting pressures. Moose calving sites are of particular concern for the AIMC especially in relation to dust/air emissions degrading the habitat quality and health of the moose population.</p> <p>The AIMC requests further engagement with IAAC</p>

	consumption and cultural continuity.”	develop effective mitigation measures for protection of moose and related impacts to Métis rights.
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## APPENDIX C: Potential Conditions Comments

The following review focusses only on those conditions applicable to addressing impacts to AIMC rights.

#	Condition	Associated AIMC impacted right(s)	AIMC Comment
1	2.2: Consultation requirements	Hunting, trapping, gathering plants Fishing Cultural Continuity Governance and Stewardship	<p>The conditions propose a pan-Indigenous approach to consultation activities. Different Indigenous groups have differing capacities, resources, timelines and consultation protocols which require a distinctions-based approach.</p> <p>The AIMC highly recommends incorporating the requirement for the Proponent to develop, through consultation with the AIMC, a Métis-specific consultation workplan for each condition requiring consultation including long-term monitoring. The consultation workplan must consider the scope of the consultation required for the relevant condition, the capacity and resourcing of the AIMC, the timing of the consultation activities, etc. The consultation workplan must be agreed to by all parties prior to implementation.</p>
2	2.3: Consultation requirements	Hunting, trapping, gathering plants Fishing Cultural Continuity Governance and Stewardship	<p>The Proponent should develop a communication protocol with each Indigenous group that aligns with that Indigenous group's consultation protocols, needs or requirements.</p> <p>As for 2.2, the communication protocol for the AIMC should be Métis-specific and incorporate the AIMC Consultation Protocols.</p>
3	2.4: Follow-up requirements	Hunting, trapping, gathering plants Fishing	<p>All follow-up programs should include the requirement for adaptive management plans for various foreseeable scenarios, such as threshold exceedances, accidents and malfunctions,</p>

		Cultural Continuity Governance and Stewardship	<p>etc. Adaptive management plans should include specific actions to be implemented at benchmark thresholds, with specific timelines for each action/step to be taken. Adaptive management plans should also include a notification procedure (as per Comment #2) if additional mitigation measures are required, to Indigenous groups consulted in the development of the follow-up program.</p> <p>The AIMC requests that the Proponent should provide the details of the results of the follow-up program, <b>including any suggested or implemented adaptive management measures, to the Agency and the parties being consulted during the development of the follow-up program.</b></p>
4	<p>2.7.4; and 2.8</p> <p>“...if modified or additional mitigation measure(s) are required pursuant to condition 2.7.3, develop and implement these mitigation measure(s) as soon as feasible and monitor them pursuant to condition</p> <p>2.7.2. The Proponent shall notify the Agency in writing within 24 hours of any modified or additional mitigation measure being implemented. If the Proponent implements any additional or modified mitigation measure not previously submitted to the Agency pursuant to condition</p> <p>2.4.6, the Proponent shall submit a detailed description of the measure(s) to the Agency within 7 days of their implementation; and”</p>	<p>Hunting, trapping, gathering plants Fishing</p> <p>Cultural Continuity Governance and Stewardship</p>	<p>Indigenous groups being consulted in the development of the follow-up program should also <b>be notified as soon as feasible</b>, if modified or additional mitigation measures are required. Particularly, as follow-up programs are intended, in part, as mitigation measures for impacts to Métis rights. Any change in the applied mitigation measures should be agreed to by the AIMC prior to implementation.</p>
5	<p>2.7.5:</p> <p>“...report all results of the follow-up program to the Agency no later than 3 months following each reporting year during which the follow-up</p>	<p>Hunting, trapping, gathering plants Fishing</p>	<p>Annual reporting requirements alone may not be sufficient for all follow-up programs. Each follow-up program should have a reporting requirement which aligns with the purpose of the follow-up program in order to ensure mitigation measures are being implemented effectively. In some instances, impacts to</p>

	<p>program is implemented and, subject to information determined pursuant to 2.4.3, to the parties being consulted during the development of the follow-up program. As part of reporting the results of the follow-up program, the Proponent shall, for each follow-up program, provide an analysis and conclusion about the accuracy of the effects predictions made during the impact assessment or effectiveness of mitigation measures or both.”</p>	<p>Cultural Continuity Governance and Stewardship</p>	<p>Métis rights may have already occurred prior to the annual reporting and any suggested corrective actions by the Agency. More frequent reporting can ensure timely and effective Agency oversight throughout all phases of the Project. Increasing reporting frequency can also help in alleviating Indigenous group uncertainty and concern with respect to the Project development and impacts to rights.</p>
<p>6</p>	<p>5.1.4; and 6.1.5: These are references to workplace training requirements that are designed to mitigate various harms to Indigenous People through cultural sensitivity training.</p>	<p>Cultural Continuity</p>	<p>The pan-Indigenous approach throughout the IA Report is problematic and could also be the same approach in the proposed training without involvement of AIMC. An overreliance on CNC staff training to ameliorate many of these concerns is also problematic. Staff training for incidental archeological finds and cultural awareness in general does not directly translate to improved outcomes regardless of participation tracking without regular evaluations.</p>
<p>7</p>	<p>5.1: The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities and implement during all phases of the Designated Project, measures to promote safe, respectful and inclusive conduct in the workplace. These measures shall include actions to respond to call to justice 13.1 in Reclaiming Power and Place: The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls.</p>	<p>Cultural Continuity Governance and Stewardship</p>	<p>The AIMC requires a distinctions-based approach be applied in the development and implementation of this condition.  See comment #1.</p>
<p>8</p>	<p>5.2: The Proponent shall develop, prior to</p>	<p>Cultural Continuity Governance and</p>	<p>The AIMC requires a distinctions-based approach be applied in the development and implementation of this condition.</p>

	<p>construction and in consultation with Indigenous groups and relevant authorities, and implement during all phases of the Designated Project, a community feedback protocol for receiving and addressing complaints related to the exposure to noise, dust, air quality, water quality and other community safety concerns generated by the Designated Project. The Proponent shall provide the protocol to the Agency and Indigenous groups prior to construction and make the protocol publicly available online.</p>	Stewardship	See comment #1.
9	<p>5.3; and 5.10</p> <p>The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Indigenous Services Canada and other relevant authorities, and implement, during construction and operation, a Training and Employment Plan to increase opportunities for Indigenous Peoples, including Indigenous women and Indigenous businesses, to obtain skills and training, employment, procurement or contracting opportunities related to the Designated Project.”</p>	<p>Hunting, trapping, gathering plants</p> <p>Fishing</p> <p>Cultural Continuity</p> <p>Governance and Stewardship</p>	<p>The AIMC requires a distinctions-based approach be applied in the development and implementation of this condition.</p> <p>While the Training and Employment plan for Indigenous Peoples is appreciated, it is very different from a commitment to actually hire Indigenous People or Métis individuals (particularly in underrepresented groups). Plans and concrete actions are not equal, and strong commitments to share the employment benefits of this Project would be beneficial in regards to relationship building as well as equity. As it stands, these plans could result in no employment benefits for the AIMC if not clarified, such as with specific distinctions-based employment targets and evaluations.</p> <p>Condition 5.10 which pertains to a follow-up program for this condition does seek to address this reality, but it relies too heavily on plans or studies to reduce the concern entirely. For example, what is the appropriate number of Indigenous Peoples hired by the Project? Is it 1 or 100? Similarly, what are the targets for the identity factors that are listed in section 5.10? It is noble to have these as over arching goals but without actually mandating that there are tangible benefits and employment opportunities for the impacted Communities it is a</p>

10	<p>5.4: The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant health authorities, and implement during all phases of the Designated Project, measures to mitigate the impacts of the Designated Project on the mental and physical well-being of Indigenous Peoples. In doing so, the Proponent shall establish a workplace health promotion program that includes worker mental and physical well-being, including additions awareness training and access to additions support services and remove barriers to seeking assistance, including by establishing a non-reprisal process for workers who access support services, to the extent permitted by applicable laws and any applicable workplace policies.</p>	Cultural Continuity Governance and Stewardship	<p>potential mitigation rather than a real one.</p> <p>This condition misses the point of the concerns that the AIMC have raised on this topic. The workers, unless Métis citizens or other Indigenous Peoples, are not the ones that are facing the mental and physical issues that this condition seeks to address.</p> <p>While the AIMC is not opposed to employee supports and is supportive of the concept, as written, this condition will not be effective in mitigating impacts of the Project on the mental and physical well-being of Métis citizens.</p> <p>The AIMC requires additional engagement with IAAC to develop mitigation measures appropriate for addressing impacts to the Métis Community mental and physical well-being.</p>
11	<p>5.6: The Proponent shall develop, prior to construction and in consultation with Indigenous groups and potentially affected municipalities, an Accommodation Plan for housing to mitigate the impact and adverse effects of the Designated Project workforce on the availability and affordability of housing for Indigenous Peoples</p>	Cultural Continuity Governance and Stewardship	<p>Similar to comment 9 above, a plan involving a housing study and cooperation with relevant stakeholders is not an actual mitigation unless the study results are enforceable. If there are no or insufficient numbers of quality dwellings built, and more people are living in the region, then that is an impact on citizens. Information on safe and accessible housing, particularly short-term for 2-spirit, women, girls and non-binary citizens, is not included.</p> <p>There is no mention of the likely increased cost of living and inequality that is associated with increased housing pressures within the conditions which is another significant aspect of this concern.</p>

12	<p>5.8: The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Health Canada, the Ontario Ministry of Environment, Conservation and Parks, and any relevant authorities, and implement during the construction, operation and decommissioning phases of the Designated Project, a follow-up program to verify the accuracy of the impact assessment and determine the effectiveness of mitigation measures with respect to adverse federal effects from the Designated Project on the health of Indigenous Peoples resulting from changes in fish consumed as country foods.”</p>	<p>Hunting, trapping, gathering plants Fishing</p>	<p>The AIMC recommends that IAAC expand its assessment to include all heavy metals and their valences in Project ores such as Cd. The assessment should consider heavy metal uptake in vegetation and fungi, concentration in channel bars and chutes, and focus on areas downstream of final discharge locations within the affected watershed. The assessment should consider the potential toxicity of invertebrates, terrestrial wildlife, vegetation, and fungi relative to human consumption.</p> <p>See also Appendix B, Comments #4 and #5.</p>
13	<p>5.9: The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Health Canada, the Ontario Ministry of Environment, Conservation and Parks, and any relevant authorities, and implement during the construction, operation and decommissioning phases of the Designated Project, a follow-up program to verify the accuracy of the impact assessment and determine the effectiveness of mitigation measures with respect to adverse federal effects from the Designated Project on the health of Indigenous Peoples resulting from changes in surface water quality.</p>	<p>Hunting, trapping, gathering plants Fishing</p>	<p>It is not clear why IAAC's recommendation focusses solely on sulphates and tungsten, and does not include other heavy metals known to be within the Project ores (see also Comment #4). Additionally, the Provincial Water Quality Objectives do not contain appropriate thresholds for human consumption for some heavy metals including nickel, cadmium and cobalt.</p> <p>The elevated MeHg and mercury levels in fish within the LSA clearly demonstrates the necessity for collaboration between the AIMC and regulators on other heavy-metal contaminants, including Cd, Ni, Co.</p> <p>The AIMC recommends the water quality monitoring follow-up program include requirements for heavy-metal monitoring as contaminants of potential concern to be collaborative with Health Canada and developing new recommendations.</p> <p>See also Appendix B, Comments #4 and #5.</p>
14	<p>7.3:</p>	<p>Hunting, trapping,</p>	<p>While site workers would be excluded from harvesting in the Project Area, this is waived if said employees are from an</p>

15	<p>The Proponent shall prohibit Designated Project employees and contractors from fishing, hunting, trapping, plant gathering and using off-road vehicles for recreational purposes within the Designated Project area or using the Designated Project area to access surrounding areas for these purposes unless an employee or contractor is provided access by the Proponent for exercising Indigenous rights, to the extent that such access is safe</p>	<p>gathering plants Fishing Cultural Continuity Governance and Stewardship</p>	<p>Indigenous group with rights in the area. While this in itself is not a problem, if there is a significant Indigenous workforce employed by CNC, which is a stated objective, it could significantly increase harvesting pressure in and around the Project Area due to the increased concentration of harvesters in this area that would otherwise be dispersed.</p>
8.1:	<p>The Proponent shall retain, prior to construction, the services of Indigenous monitor(s) to participate in the implementation of follow-up programs. Prior to retaining the services of Indigenous monitor(s), the Proponent shall undertake a collaborative process to determine, in consultation with Indigenous groups, the scope, purpose and objectives of the participation of Indigenous monitor(s). The Proponent shall provide this information to the Agency prior to construction with the permission of the respective Indigenous group.</p>	<p>Hunting, trapping, gathering plants Fishing Cultural Continuity Governance and Stewardship</p>	<p>Similar to previous comments, this condition lacks a distinctions-based approach or clear commitments to Métis inclusion within monitoring and follow-up programs. The condition prioritizes Proponent decision-making does not indicate that all Indigenous groups will be treated equally in the selection process. The Proponent decides the hiring, the monitoring location, the type of monitoring that will be conducted, and how the monitoring will be supported. As written, the Proponent could apply a pan-Indigenous approach, with no guaranteed outcomes for Métis involvement in the Indigenous monitor program. As such, this condition does not constitute a mitigation measure for impact to Métis s. 35 rights, in its current form. Including commitments for each community to have an equal share in monitoring for all stages of the Project (pending interest) would substantially reduce these concerns.</p> <p>The AIMC recommends that IAAC incorporate a distinctions-based approach and equal-share requirement into to the Condition 8.1.</p>