

**Ministry of Citizenship  
and Multiculturalism**

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**Ministère des Affaires civiques  
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June 10, 2026

EMAIL ONLY

Amy Sen  
Director, Ontario Region  
Impact Assessment Agency of Canada  
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**MCM File** : **0015835**  
**Proponent** : **Canada Nickel Company**  
**Subject** : **Draft Impact Assessment Report and Draft Potential Conditions**  
**Project** : **Crawford Nickel Project**  
**Location** : **Geographic Townships of Nesbitt, Beck, Mahaffy, Crawford, Lucas, Carnegie, and Prosser in District of Cochrane and the City of Timmins**

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Dear Amy Sen,

Thank you for your letter of May 11, 2026, inviting the Ministry of Citizenship and Multiculturalism (MCM) to comment on the Draft Impact Assessment Report and Draft Potential Conditions for the Crawford Nickel Project.

MCM's interest in this Environmental Assessment (EA) project relates to its mandate of conserving Ontario's cultural heritage.

**Project Summary**

On May 11, 2026, the Impact Assessment Agency of Canada (IAAC) announced the commencement of a comment period for the draft Impact Assessment (IA) Report and draft potential conditions for the proposed Crawford Nickel Project (the project), an open-pit nickel-cobalt mine and on-site metal mill, located 43 kilometres north of Timmins, Ontario. As proposed, the Crawford Nickel Project would have a mine ore production capacity of 275,000 tonnes per day and a mill ore input capacity of 120,000 tonnes per day. The project would operate for about 43 years.

The draft IA Report includes IAAC's analysis, conclusions and recommendations regarding the adverse effects within federal jurisdiction of the project (as described under section 2 of the IAA) and the associated recommendations mitigation measures and follow-up programs to mitigate and monitor these effects.

## Comments

We have reviewed the *Draft Impact Assessment Report* (prepared by IAAC, dated May 2026) and the draft *Potential Conditions* established under Section 64 of the IAA. We have the following comments and recommendations:

In February 2024, MCM provided comments to IAAC as part of a scoped review of the proponent's draft *Impact Statement* for the Crawford Nickel Project in support of federal impact assessment process under the *Impact Assessment Act, 2019* (IAA). We noted at this time that potential impacts to cultural heritage resources (including archaeological resources, built heritage resources, and cultural heritage landscapes) as part of this project were only considered from the perspective of Indigenous communities, and recommended that potential impacts to cultural heritage resources relating to non-Indigenous communities also be considered. MCM subsequently provided comments to IAAC in December 2024 on a later draft of the Impact Statement and noted that MCM's recommendations were not incorporated.

We find that the consideration of impacts to cultural heritage resources outlined in Section 4.2 in the report is similarly focussed only on Indigenous Communities and that there is no discussion of cultural heritage resources related to non-Indigenous communities. Although effects outlined under the IAA are related to Indigenous Communities, we continue to recommend that a *Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment* (Cultural Heritage Report) be undertaken for the entire study area during the planning phase. It is important to note that the *Ontario Heritage Act* will not trigger further technical cultural heritage studies. From the perspective of IAA compliance, the Cultural Heritage Report, and subsequent IAR, should make clear recommendations regarding next steps, including the requirement for any additional technical cultural heritage studies.

This report should identify known and potential built heritage resources/cultural heritage landscapes (BHRs/CHLs) of significance to Indigenous and non-indigenous peoples. The report should also give preliminary consideration to potential project specific impacts on these resources and make recommendations on how to mitigate these impacts. Our records show that a Cultural Heritage Screening Report (CHSR) was carried out for the project under the federal impact assessment process (prepared by WSP Ltd., dated August 12, 2022) to identify built heritage resources (BHRs) and cultural heritage landscapes (CHLs) within the project area. The information in this report may be useful in supporting the completion of the Cultural Heritage Report.

The project description included in Section 1.1 of the report indicates that there will be significant in-water works associated with this project. The report does not clearly state whether the project will impact marine archaeological resources. Completion of the screening checklist [Criteria for Evaluating Marine Archaeological Potential](#) will indicate either that a marine archaeological assessment is required or not required. If required, a marine archaeological assessment should be completed as part of the IA as early as possible during detailed design and prior to any ground disturbing activities.

Please note that archaeological concerns have not been fully addressed until reports have been entered into the Ontario Public Register of Archaeological Reports ('the Register') where those reports recommend that:

1. the archaeological assessment of the project area is complete and
2. all archaeological sites identified by the assessment are either of no further cultural heritage value or interest (as per Section 48(3) of the Ontario Heritage Act) or that mitigation of impacts has been accomplished through excavation or an avoidance and protection strategy.

Approval authorities and/or proponents should wait to receive the MCM's written confirmation that the archaeological assessment report(s) has been entered into the Register before issuing a decision or proceeding with any ground disturbing activities. The letter will also indicate either that there are no further concerns for impacts to archaeological resources or articulate next steps to mitigate any concerns.

We have provided detailed comments and revisions in tracked changes in the attached annotated draft Impact Assessment Report.

Thank you for the opportunity to review this draft Impact Assessment Report and potential conditions. If you have any questions or any of our comments require clarification, please do not hesitate to contact me.

Sincerely,

Liam Smythe  
Heritage Advisor (A)  
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Copied to: Caitlyn Tindale, Director, Heritage Operations Branch, MCM  
James Hamilton, Manager, Heritage Planning Unit, MCM  
Karla Barboza, Team Lead, Heritage Planning Unit, MCM

It is the sole responsibility of proponents to ensure that any information and documentation submitted as part of their EA report or file is accurate. The Ministry of Citizenship and Multiculturalism (MCM) makes no representation or warranty as to the completeness, accuracy or quality of the any checklists, reports or supporting documentation submitted as part of the EA process, and in no way shall MCM be liable for any harm, damages, costs, expenses, losses, claims or actions that may result if any checklists, reports or supporting documents are discovered to be inaccurate, incomplete, misleading or fraudulent.

Should previously undocumented archaeological resources be discovered, they may be a new archaeological site and therefore subject to Section 48(1) of the *Ontario Heritage Act*. The proponent or person discovering the archaeological resources must cease alteration of the site immediately and engage a licensed consultant archaeologist to carry out an archaeological assessment, in compliance with Section 48(1) of the *Ontario Heritage Act*.

The *Funeral, Burial and Cremation Services Act, 2002, S.O. 2002, c.33* requires that any person discovering human remains must cease all activities immediately and notify the police or coroner. If the coroner does not suspect foul play in the disposition of the remains, in accordance with *Ontario Regulation 30/11* the coroner shall notify the Registrar, Ontario Ministry of Public and Business Service Delivery and Procurement, which administers provisions of that Act related to burial sites. In situations where human remains are associated with archaeological resources, the Ministry of Citizenship and Multiculturalism should also be notified (at [archaeology@ontario.ca](mailto:archaeology@ontario.ca)) to ensure that the archaeological site is not subject to unlicensed alterations which would be a contravention of the *Ontario Heritage Act*.