

**Ministry of the Environment,
Conservation and Parks**

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**Ministère de l'Environnement, de la
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June 25, 2026

MEMORANDUM

TO: Joelle Leblanc
Project Officer, Environmental Assessment Branch

FROM: Paula Spencer
Senior Science Advisor, Priority Sector Support Unit

RE: Crawford Nickel Project - Draft Impact Assessment Report

PURPOSE

As requested, I have reviewed the Draft Impact Assessment Report for the Crawford Nickel Project dated May 2026 and prepared a summary table of MECP comments, as well as a tracked changes version of the Draft Impact Assessment Report.

Summary of MECP Comments – Crawford Nickel Project IA Report

Topic	Summary of Comment
Effluent Receivers	MECP recommends not presenting the North Driftwood River and West Buskegau River as accepted effluent receivers. Alternative receivers should remain under consideration and final discharge locations may change during permitting (pages 21 and 69).
Effluent Discharge	Acceptability of treatment, effluent discharge approaches, discharge locations, mitigation measures, and monitoring requirements will be

	determined through provincial permitting. Receiver-based criteria, assimilative capacity studies, and mixing zones have not been accepted from a provincial permitting perspective. (throughout IA report).
Groundwater Confidence Statements	Recommended removing statements that overstate certainty in groundwater and watershed-scale modelling. Groundwater review supports only moderate confidence (page 18).
Receiver-Based Criteria	The proposed receiver-based criteria used in assimilative capacity modelling have not been accepted by MECP and represent an area of uncertainty in the IA report. Final effluent limits, objectives, and criteria would be established through Environmental Compliance Approval (ECA) process. Concerns were raised with the approach used to develop receiver-based criteria and noted previous concerns regarding consistency with B-1-5 guidance (page 21)
References to Specific Water Quality Criteria	Recommended removing references to specific provincial criteria or guidance documents because other approaches and criteria may ultimately be applied through permitting (pages 21, 22, 24 and 78).
Mixing Zone Estimates	Clarified that acceptable mixing zone lengths are site-specific and will be established during provincial permitting. The proponent's statement that "full physical mixing" occurs within ~200 m was viewed as potentially misleading because it does not represent the extent of potential ecological effects or regulatory mixing zones, which could be much longer (i.e. tens of kilometres downstream). Statements regarding potential impacts based on a mixing zone length of a few hundred meters should be removed (pages 22, 23, 67, 69, 114)

Spatial Extent of Water Quality Effects	Concerns were raised that the document underestimates the potential downstream extent of impacts to aquatic life, noting effects could occur over much greater distances than described once mixing zone sizes are determined during provincial permitting. Recommend removing references linking Lake Sturgeon interactions to undetermined mixing zones until those zones are established through provincial permitting (throughout IA report).
Fish Tissue Data Requirements	Noted the requirement for the proponent to provide fish tissue mercury data. Please note that MECP has not committed resources to undertake the work in statements on pages 78 and 89, IAAC should consider revising the language to reflect.
Sulphate, Tungsten and Mercury Thresholds	References suggesting that MECP would establish project-specific sulphate, tungsten, methylmercury, or arsenic thresholds should be removed. Note that threshold development, application of criteria, and fish consumption advisory decisions should not be attributed to MECP in the IA report (pages 89 and 90).
Overall Comment	Recommended removing text that implied future provincial acceptance, approval, or endorsement of technical approaches.
Overall Comment	IAAC indicates in Tables 4-9 that follow-up programs and mitigation measures will be developed, in consultation with Indigenous groups and MECP, prior to construction and implemented during construction, operations and decommissioning. How will this be enforced or regulated?

CLOSURE

If you have any questions regarding the above comments, do not hesitate to contact me. The purpose of the preceding review is to provide advice to the Ministry of the Environment, Conservation and Parks regarding the Draft Impact Assessment Report for the Crawford Nickel Project. The conclusions, opinions and recommendations of the reviewer are based on information provided by others, except where otherwise specifically noted. The ministry cannot guarantee that the information that has been provided by others is accurate or complete. A lack of specific comment by the reviewer is not to be construed as endorsing the content or views expressed in the reviewed material.

<original signed by>

Paula Spencer
Senior Science Advisor

Cc: Chris Mahon, Manager, PSSU
Matt Hoffmeister, Project Coordinator, PSSU