



***Delivered electronically***

April 30, 2026

**ATTN:** Aidan Fehr, Impact Assessment Agency of Canada  
Katherine St James, Environmental Assessment Office

**RE: Federal and provincial assessment processes for the Baptiste Nickel Project  
Proposed by FPX Nickel Corporation**

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Dear Aidan and Katherine,

We are writing on behalf of Binche Whut'en and Binche Keyoh (as represented by Binche Keyoh Bu Society), Takla Nation and Yekooche First Nation (referred to as "the Nations") in response to the Baptiste Nickel Project proposed by FPX Nickel Corporation (Letter Reference 418930 – dated January 23, 2026).

We would like to thank you for including us in the review of the Baptiste Nickel Project Initial Project Description (IPD) and Initial Project Description Summary, both dated January 2026. Our review and response represent a collaborative effort to understand this complex endeavor and express to the best of our ability our opinions and interests relative to the information provided. We trust that our responses will be addressed either through clarification or accommodation in formalized communications.

We have provided below a high-level response to identify key areas of concern that we feel require further clarification or acknowledgement such that we may continue to progress our understanding of the project and efforts to complete studies that will inform impacts and help to develop mitigation and reclamation objectives and plans.

### **Existing Biophysical Environment**

Section 7 of the IPD lists the project specific baseline studies that have been completed to date and in some cases ongoing studies. As of the date of this letter, the Nations have not seen any baseline studies that have been completed. It is also our understanding that additional studies will be required, however these should be described in the IPD. In order to ensure we are duly informed and are able to ensure existing and proposed studies adequately reflect our interests

and address our concerns, we will need to review the baseline studies and proposed work plans.

The Nations sent a formal request to FPX Nickel on March 5, 2026, for a copy of the environmental baseline data that has been collected to date in its most fundamental raw form and/or in a summarized format. This request is to help inform the independent analysis and assessment of the project. As of the date of this letter, we have not yet heard back from FPX Nickel regarding this request.

### ***Ecosystems and Vegetation***

Whitebark Pine is a federally listed endangered species and a keystone component of subalpine ecosystems. There is no mention of its distribution, relative abundance or importance within the IPD.

### ***Wildlife and Wildlife Habitat***

The Takla caribou herd is mentioned within this section but the importance of this species to the Nations' cultural and ecological significance which depend on caribou and lichen ecosystems has not been mentioned.

Simply listing other culturally significant wildlife species that have been observed or may occur within the PDA provides no information to identify or quantify important habitats or connective corridors relative to the development areas. The IPD should identify whether any baseline wildlife habitat mapping or modelling has been completed or proposed in work plans for species of management concern/cultural significance.

### ***Fish and Fish Habitat***

The existence of healthy and abundant fish populations on the Nations territory is imperative to its food security and cultural survival. Mine development, operation, and its tertiary activities have the potential to seriously impact fish. Furthermore, while mine infrastructure is normally designed not to catastrophically fail, its existence introduces an existential threat to fish and wildlife that would otherwise not be there.

FPX's IPD seems to have a minimal appreciation for how it will interact with fish habitat. While this theme is identified as a value component and an issue/concern raised by First Nations, we are not satisfied with the depth or specificity in the IPD. For Takla to be more comfortable with the IPD, we would urge FPX to include the following:

- More language should be included on how the project would (or could) impact the ability for Indigenous peoples to continue to exercise their right to harvest fish. There

needs to be a stronger focus on Sockeye salmon designated units 20 and 21.

- While the project is being presented as hydraulically isolated from Environmentally Sensitive Species (ESS) spawning and rearing habitat, the siting of major infrastructure in these watersheds is still an immense risk. Therefore, the IPD should provide early and strong identification of this concern, especially if FPX is going to pursue a substituted EA process.
- Furthermore, regardless of the project's avoidance of direct (footprint) impacts on critical salmon habitat, it still needs to contemplate mitigation and offset measures from a precautionary standpoint. There should also be acknowledgement of the intent to implement short and long term monitoring and stewardship to ensure the viability of this resource. This is especially important due to its location in the highly sensitive headwaters of multiple "bastion" ESS watercourses.

### ***Water Quality***

Water quality is of extreme importance to the Nations due to its long history of enduring contamination and alteration by natural resource extraction. Like all major mine IPDs, the one prepared by FPX captures the basic elements of approaching and managing these risks, but not to the level of specificity that the Nations prefer.

Within the IPD, water quality is distilled into the two main categories of (1) quality relative to aquatic habitat; and (2) quality of ground water. The Nations do not view water in such rigid classifications, especially since neither of these areas contemplate the use of water for human consumption. In its present form, the land that FPX intends to occupy hosts waterbodies, watercourses, and groundwater aquifers that are suitable for human consumption. The Nations understand that mining companies often take the position that once a mine is installed, it renders the opportunities for human consumption of water as obsolete. As a result, this lowers water quality standards and increases the tolerances for contaminants that would otherwise not be tolerated in drinking water.

Creating a sense of comfort on water with the Nations will be crucial for both FPX and Takla to arrive at a mutual understanding of each other's water needs and for those to be clearly and respectfully contemplated in the assessment processes and mine operation. Early identification and emphasis of this issue is strongly encouraged. For greater specificity, the Nations need to feel confident that every reasonable avenue to assess metal leaching and acid rock drainage ("MLARD") is evaluated and that FPX treats all water as a related and reciprocal life system regardless of western definitions of conductivity, connectivity, and classification. The Nations recommends that the subject of "Water Quality" is broken out into its own category so that it is not inadvertently viewed exclusively through the lens of aquatic habitat.

## **TSF Siting**

Since the early stages of engagement there has been an understanding that the final location of the tailings storage facility (“TSF”) that has been presented by FPX would be part of a collaborative decision- making process with First Nations. This is especially important given the overall project interface with the proposed Prince Rupert Gas Transmission (“PRGT”) pipeline and other natural features such as Paula, Sidney, and Baptiste Creek(s).

The IPD gives the impression that there is now only one preferred TSF location and that it was selected based on collaborative feedback which is false. While the Nation’s had members engaged in a technical workshop that briefly detailed TSF siting, their participation was not sufficient to substantiate a collaborative decision. Furthermore, since that original workshop, there has been no dialogue with FPX on alternative designs but instead a lengthy and protracted discussion on linear infrastructure which appears to have a great deal of flexibility. It is our understanding that at least one viable alternative is to be identified and investigated to the extent necessary to support the selection of a preferred option.

The Nations are concerned that FPX is being selective over which infrastructure and mine design elements it permits First Nations to be involved with. The inconsistent messaging and confusion around the TSF described in the IPD is only one instance of this pattern, but it is one of the most important issues to Takla now.

## **Comments on the Engagement Plan**

The Engagement Plan (“EP”) provided to us is clear, concise, and has largely aligned present and past engagement plans that we have experienced. The engagement between FPX and the Nation’s has been positive and accommodating. In many aspects, collaborative engagement work on the Baptiste project has set a new standard and set expectations for all mineral exploration and mine development companies in the province. However, FPX has chosen to collaborate on technical matters through a series of dedicated workshops. So far, only a few categories of technical subjects have been discussed. While these have been very valuable opportunities, the Nation’s most significant interests and concerns are in categories that have not yet been discussed, let alone planned.

Overall, Binche Whut’en and Binche Keyoh Bu Society, Takla Nation and Yekooche First Nation supports the Baptiste Nickel Project. However, this support is contingent on progressing our understanding of the risks to our shared values and interests and the how existing and proposed studies will address these concerns and ensure the preservation of environmental resources and cultural values.

Please do not hesitate to contact any of the undersigned with questions or concerns.

Sincerely,

Dave Birdi, Dwayne Martin – **Binche Whut'en**

Joshua Hallman – **Binche Keyoh Bu Society**

Evan MacKinnon – **Takla Nation**

Steve Nycholat, Dean Cherkas – **Yekooche First Nation**

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**CC:** **Kevin Wilson** – <email address removed>  
**Chief John Allen French** – <email address removed>  
**Chief Anthony Jopse** – <email address removed>  
**Chief Partner Schielke** – <email address removed>