

Crawford Nickel Project Impact Statement

Chapter 25 Assessment of Potential Effects on Apitipi Anicinapek Nation's Interests



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November 22, 2024

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Acronyms and Abbreviations

AAN	Apitipi Anicinapek Nation
AAN-LRD	Apitipi Anicinapek Nation Land and Resources Department
AAN-CD	Apitipi Anicinapek Nation Culture Department
ARLP	Apitipi Resources LP
AQMP	Air Quality Management Plan
CEGEP	Collège d’enseignement général et professionnel
CEPP	Construction Environmental Protection Plan
CDSSAB	Cochrane District Social Services Administration Board
CHSR	Cultural Heritage Screening Report
CIRNAC	Crown-Indigenous Relations and Northern Affairs Canada
CO ₂ e	Carbon Dioxide Equivalent
CoPCs	Contaminants of Potential Concern
CVHI	Cultural heritage value or interest
DFO	Fisheries and Oceans Canada
ECEs	Early childhood educators
EPRP	Emergency Preparedness and Response Plan
FedNor	Federal Economic Development Agency of Northern Ontario
FPIC	Free, Prior and Informed Consent
FTEs	Full-time equivalents
GIS	Geographic Information System
GoC	Government of Canada
GoC RCSC	Government of Canada Reporting Centre on Specific Claims

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Acronyms and Abbreviations – Chapter 25 Assessment of Potential Effects on Apitipi Anicinapek Nation’s Interests

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GovOnt	Government of Ontario
Ha	Hectares
HMSP	Health and Medical Services Plan
IA	Impact Assessment
IAA	Impact Assessment Act
IAAC	Impact Assessment Agency of Canada
IEK	Indigenous Ecological Knowledge
IEPP	Indigenous Engagement and Partnership Plan
Km	Kilometre
kt	Kilotonnes
kV	Kilovolt
LSA	Local Study Area
MECP	Ontario Ministry of the Environment, Conservation and Parks
MCM	Ontario Ministry of Citizenship and Multiculturalism
mi ²	Square miles
MMB	Modelled Mine Boundary
MMIWG	Missing and Murdered Indigenous Women and Girls
MNR	Ministry of Natural Resources
MOEE	Ministry of the Environment and Energy
NAN	Nishnawbe Aski Nation
NAPS	Nishnawbe Aski Police Services
n.d.	No date
NNADAP	National Native Alcohol and Drug Abuse Program
NORCAT	The Northern Centre for Advanced Technology

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OAHS	Ontario Aboriginal Housing Services
OFNTSC	Ontario First Nation Technical Services Corp.
OSSD	Ontario Secondary School Diploma
PA	Project Area
PIN	Property Identification Number
RHO	Regional Historical Overview
RSA	Regional Study Area
SCC	Supreme Court of Canada
SGHC	Sweetgrass Health Centre
Stage 1 AA	Stage 1 Archaeological Assessment
Stage 2 AA	Stage 2 Archaeological Assessment
Stage 3 AA	Stage 3 Archaeological Assessment
The Project	Crawford Nickel Project
TIS Guidelines	Tailored Impact Statement Guidelines
TMF	Tailings Management Facility
TRCC	Truth and Reconciliation Commission of Canada
TWG	Technical Working Group
UN	United Nations
UNDRIP	United Nations Declaration on the Rights of Indigenous Peoples
VC	Valued Component
WFN	Wahgoshig First Nation
2SLGBTQQIA+	Two-Spirit, Lesbian, Gay, Bisexual, Transgender, Queer, Questioning, Intersex, Asexual, and all other sexual orientations and genders

25 Assessment of Potential Effects on Apitipi Anicinapek Nation's Interests

Canada Nickel Company (Canada Nickel) is proposing to construct the Crawford Nickel Project (the Project). The Project is within the boundaries of Treaty 9 (also known as the James Bay Treaty) and the Traditional Territory of Apitipi Anicinapek Nation, as provided by the Nation (GoC 1964).

The Impact Assessment Agency of Canada (IAAC) intends to consult with Apitipi Anicinapek Nation to understand the concerns and potential effects of the Project on their exercise of potential or established Indigenous or Treaty rights and, where appropriate, make accommodations.^{1,2} These consultations will be integral to the assessment of the Project. Canada Nickel has accordingly prepared this chapter of the assessment to consider the potential effects of the Project on the interests of Apitipi Anicinapek Nation.

This chapter presents information on Canada Nickel's understanding of how the Project may affect Apitipi Anicinapek Nation's interests. The assessment of potential Project effects (both adverse and positive) on Apitipi Anicinapek Nation's interests includes consideration of impacts to Indigenous or Treaty rights recognized and affirmed by section 35 of the *Constitution Act, 1982* as well as other interests identified by Apitipi Anicinapek Nation. Canada Nickel understands that the Indigenous or Treaty rights exercised or practiced in the area of the Project include, but are not limited to, hunting, trapping, fishing, and undertaking cultural pursuits; these activities are closely connected to and informed by Indigenous physical and cultural heritage, as well as the environmental, health, social, and economic conditions required for Indigenous land and resource use.³ Therefore, this chapter of the Impact Statement considers Indigenous interests that are broader than the activities typically addressed by case law (e.g., hunting, fishing, trapping) to include any matters of importance identified by Apitipi Anicinapek Nation. Of note, as an impact assessment is not a rights determination process, it is not intended to define or delimit the established or asserted rights of Apitipi Anicinapek Nation.

25.1 Scope of Assessment

This chapter considers potential effects on Indigenous interests, including Indigenous health conditions, Indigenous socio-economic conditions, Indigenous physical and cultural heritage, Indigenous land and resource use, as well as Indigenous and Treaty Rights in accordance with the federal and provincial requirements for the Project,⁴ and as informed by Apitipi Anicinapek Nation.

¹"Indigenous" has the meaning assigned by the definition of Aboriginal peoples of Canada in subsection 35(2) of the *Constitution Act, 1982*: (2) In this Act, "Aboriginal peoples of Canada" includes the First Nation, Inuit and Métis peoples of Canada.

²As identified in the Indigenous Engagement and Partnership Plan for the Project (IAAC 2023a), available at: <https://iaac-aeic.gc.ca/050/evaluations/document/147339>.

³ Referred to as "current use of lands and resources for traditional purposes" in the TIS Guidelines for the Project.

⁴As identified in Section 12 of the TIS Guidelines.

This chapter of the Impact Statement also describes:

- The measures to be implemented by Canada Nickel to avoid, reduce, or eliminate potential adverse effects of the Project on Indigenous interests,
- Measures that may enhance or support Indigenous interests in the area of the Project, and
- The nature and extent of residual effects that are related to the Project after mitigation measures are implemented, including their contribution to potential cumulative effects

Canada Nickel's understanding of asserted or established Indigenous or Treaty rights exercised within the area of the Project is guided by the text of the relevant Treaty, interpretations of the Treaty text articulated by the findings of the Supreme Court of Canada (SCC), publicly available literature, and the perspectives of Apitipi Anicinapek Nation.

Canada Nickel will continue to respond to questions and concerns from Apitipi Anicinapek Nation through ongoing engagement and continue to provide information following submission of the Impact Statement, including Project-specific studies, which will be reviewed in the context of the Impact Statement and for incorporation into Project planning, where relevant.

25.1.1 Regulatory Context and Policy Setting

The Crown has a legal duty to consult with Indigenous Peoples and, where appropriate, accommodate, when it contemplates conduct that might adversely affect a potential or established Indigenous or Treaty right. The Crown has delegated the procedural aspects of this duty, with respect to the Project, to Canada Nickel through the guidance and requirements outlined in the TIS Guidelines and Indigenous Engagement and Partnership Plan for the Project.

This assessment also considers the following relevant regional, national, and international declarations, policies, guidance documents, and best practices as they pertain to Indigenous rights and interests in Canada:

- United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) including the principle of Free, Prior and Informed Consent (FPIC) (UN General Assembly 2008)
- Truth and Reconciliation Commission of Canada (TRCC) Final Report and 94 Calls to Action (TRCC 2015a, TRCC 2015b)
- IAAC (2021) Guidance: Gender-based Analysis Plus in Impact Assessment
- IAAC (2022a) IAAC Guidance: Assessment of Potential Impacts on the Rights of Indigenous Peoples
- IAAC (2022b) Indigenous Knowledge Policy Framework for Project Reviews and Regulatory Decisions
- IAAC (2023a) Guidance: Indigenous Knowledge under the *Impact Assessment Act* (IAA)
- IAAC (2023b) Guidance: Protecting Confidential Indigenous Knowledge under the IAA

Canada endorsed the UNDRIP in 2016 and the *UNDRIP Act* became law on June 21, 2021. Under the *Act*, Canada will work in consultation and cooperation with Indigenous Peoples to support consistency of existing and future federal laws with the UNDRIP (GoC 2023). The principles and articles of the UNDRIP establish a universal framework of minimum standards for the survival, dignity, and well-being of the Indigenous Peoples of the world and it elaborates on existing human rights standards and fundamental freedoms as they apply to Indigenous Peoples (UN General Assembly 2008). It remains one of the most comprehensive international standards on the rights of Indigenous Peoples that can inform how the *Constitution Act, 1982* and Canadian law are interpreted and developed (GoC 2023). The rights affirmed by the UNDRIP include the inherent rights to self-determination and self-government, as well as equality rights, rights relating to culture, traditional medicines, spirituality, and identity, and rights relating to ancestral lands, territories, and natural resources.

25.1.2 Influence of Engagement on the Assessment

Canada Nickel is engaging with Indigenous Nations potentially affected by the Project in accordance with its Social Purpose Statement and its engagement efforts have been developed to be consistent with the Government of Canada's commitment to implement the UNDRIP as a comprehensive international human rights instrument and Canada's roadmap for reconciliation.⁵

Feedback, including Indigenous Knowledge, shared to date by Apitipi Anicinapek Nation is found throughout this chapter and is compiled in Attachment 25.1. Attachment 25.1 also provides Canada Nickel's responses and proposed mitigation measures for the concerns and recommendations made by Apitipi Anicinapek Nation.

25.1.3 Indigenous Knowledge

The Indigenous Knowledge that Canada Nickel has identified through engagement with Apitipi Anicinapek Nation is considered in this chapter. Indigenous Knowledge is understood to include direct observations about the biophysical world, as well as ecological indicators, oral histories, community practices, language, teachings, laws, relationships, rituals, cultural identity, spirituality, cultural values, and other ways of knowing that have been identified by Apitipi Anicinapek Nation (IAAC 2022a).

Canada Nickel recognizes that western knowledge and worldviews, which have been the foundation for current Canadian and provincial legislation, policy, regulation, and institutions, may constrain how Indigenous Knowledge is incorporated in Project planning. Canada Nickel also recognizes that Indigenous Nations are best positioned to identify their priorities and interests, and to share their views in their own words, and that such information requires the same consideration as any other information source. Accordingly, Canada Nickel is responsible to bring forward and evaluate all views shared to inform Project design and planning, and to acknowledge and strive to reconcile disparities or matters of disagreement between Canada Nickel and Apitipi Anicinapek Nation. Through engagement activities, Apitipi Anicinapek Nation has been requested to provide feedback with respect to potential impacts of the Project on their rights and interests and has been provided the opportunity to validate this section of the

⁵ For further information see Chapter 2 Proponent Information and Chapter 7 Description of Engagement with Indigenous Peoples and visit <https://canadanickel.com/sustainability/>.

assessment.⁶ The outcomes of this engagement available at the time of writing are incorporated into the assessment below.

Apitipi Anicinapek Nation has also been offered the opportunity and funding by Canada Nickel to conduct Nation-led studies for the Project upon identification of interest. At the time of writing, Canada Nickel has received the following studies from Apitipi Anicinapek Nation that have been reviewed and incorporated into this assessment:⁷

- Apitipi Anicinapek Nation Canada Nickel Company Crawford Nickel Project Indigenous Knowledge, Land Use and Occupancy Study (AAN 2024a)
- Draft Apitipi Anicinapek Nation Socio-Economic Study for the Crawford Nickel Project Impact Statement (AAN 2024b)

Where made available by Apitipi Anicinapek Nation through engagement, information gathering, and voluntary information sharing, Indigenous Knowledge has been reviewed and incorporated in the Impact Statement, as applicable. Canada Nickel will continue to engage Apitipi Anicinapek Nation and will consider information provided by Apitipi Anicinapek Nation following submission of the Impact Statement, including Project-specific studies, which will be reviewed in the context of the assessment and for incorporation into Project planning, as appropriate.

25.1.4 Methods for Establishing Existing Conditions

Section 35 of the *Constitution Act*, 1982 recognizes and affirms existing Indigenous and/or Treaty rights of the First Nation, Inuit, and Métis peoples in Canada (SCC 1990, 1996). Section 35 rights are understood to be those practices, traditions, and customs integral to the distinctive culture of the Indigenous Nation claiming the right (SCC 2003; SCC 1996).

Canada Nickel understands that Apitipi Anicinapek Nation holds claim to asserted or established Indigenous and Treaty Rights in the area of the Project. By adopting a recognition-based approach informed by the regulatory and policy setting described in Section 25.1.1, this assessment includes consideration for effects to interests or matters of importance identified by Apitipi Anicinapek Nation.

⁶ See Chapter 7 (Description of Engagement with Indigenous Peoples).

⁷ The reports (AAN 2024a, b) have been provided to Canada Nickel by Apitipi Anicinapek Nation for consideration by the Crown and Canada Nickel in the Project regulatory process. Canada Nickel acknowledges that the information contained in the reports remains the property of Apitipi Anicinapek Nation and may not be used for any other purpose without the express consent of Apitipi Anicinapek Nation. For further information regarding the terms of use of the reports (AAN 2024a, b), contact Apitipi Anicinapek Nation and Canada Nickel.

A literature review was conducted to provide an overview of existing publicly available information for Apitipi Anicinapek Nation. The literature review focused on information related to rights of the Indigenous Peoples, Indigenous land and resource use, and the interests identified by Apitipi Anicinapek Nation, including the way those rights are exercised or practiced as described by Apitipi Anicinapek Nation. The literature review considered information from the following sources:

- Publicly available studies previously completed by Apitipi Anicinapek Nation for other developments
- Regulatory filings for other types of resource developments in the region
- Government reports and databases
- Historical and ethnographic literature
- Peer-reviewed literature and scientific publications
- Relevant internet sources (e.g., Apitipi Anicinapek Nation websites)

Information was drawn from sources relevant to the location of the Project and to Apitipi Anicinapek Nation.

As part of ongoing engagement with Canada Nickel, the results of the literature review, including source information, were shared with Apitipi Anicinapek Nation. Apitipi Anicinapek Nation was invited to review and provide Canada Nickel with feedback and additional sources of information so that Canada Nickel can incorporate the information into the Impact Statement.⁸

Information obtained through Canada Nickel's Project specific engagement and literature review, where available, is used in this assessment to identify potential Project interactions and assess potential effects. This information has also been considered in the assessment of related environmental and socioeconomic valued components (VCs). The results of Canada Nickel's Project specific engagement, Project specific studies, and literature review reflect the best available information regarding the interests of Apitipi Anicinapek Nation.

Existing conditions specific to Apitipi Anicinapek Nation are described in Section 25.2.

25.1.5 Potential Effects, Pathways and Measurable Parameters

A preliminary list of three representative Indigenous interests was identified for this assessment through engagement with Apitipi Anicinapek Nation, a review of issues and concerns about the Project raised by Apitipi Anicinapek Nation (Attachment 25.1), and in consideration of the federal guidance and requirements outlined in the TIS Guidelines for the Project. Additional guidance from current federal and provincial acts, IAAC policies and best practices also informed the identification of Indigenous interests for this assessment (Section 25.1.1 Regulatory Context). The preliminary list of potential effects on Indigenous interests is:

⁸ See Chapter 7 Description of Engagement with Indigenous Peoples.

- Change to Apitipi Anicinapek Nation's Indigenous and Treaty Rights (including Indigenous lands and resource use)
- Change in Apitipi Anicinapek Nation's Physical and Cultural Heritage
- Change to Governance, Health, Social and Economic Conditions of Apitipi Anicinapek Nation

Potential effects on the Indigenous interests may occur through multiple pathways including but not limited to:

- Biophysical (e.g., effects on terrestrial or aquatic resources)
- Access to lands and waters
- Cultural/experiential (e.g., presence of industrial activity disrupts peaceful enjoyment)
- Socio-economic (e.g., presence and demands of Project workforce)

This assessment applies a conservative approach that recognizes that an absence of information regarding Indigenous interests does not necessarily represent an absence of the exercise or practice of an Indigenous right. As such, this assessment assumes that Indigenous interests have the potential to occur on accessible lands and waters within Project assessment areas that overlap with the Nation's Traditional Territory and Treaty lands (as defined in Section 25.2).

Where possible, the assessment of potential effects on the Indigenous interests considered measurable parameters that are quantifiable (e.g., area of direct habitat loss). However, not all effects pathways can be quantified (e.g., cultural/experiential). Therefore, some effects are assessed qualitatively through use of feedback shared by Apitipi Anicinapek Nation, the results of other assessments for relevant VC, and professional judgment.

The Indigenous and Treaty Rights exercised or practiced in the area of the Project are understood to include but are not limited to hunting, trapping, fishing, and undertaking cultural pursuits. As such, Canada Nickel understands that the exercise or practice of Indigenous and Treaty Rights are intricately linked and influenced by environmental conditions, as well as Apitipi Anicinapek Nation's culture, history, protocols, health and wellbeing. To facilitate assessment, Table 25.1 provides representative potential effects, effect pathways, and the measurable parameters used to characterize and assess effects on Indigenous interests. The findings of the assessment may be disaggregated, as required, based on the nature of the Project components or activities, the nature of the interest within the area of the Project, and the perspectives of Apitipi Anicinapek Nation shared with Canada Nickel. Departures from the potential effects identified in Table 25.1, if any, are described in the Nation-specific assessments that follow, as informed by Canada Nickel's engagement with Apitipi Anicinapek Nation.

Table 25.1 Potential Effects, Effects Pathways, and Measurable Parameters for Indigenous Interests

Potential Effect	Effect Pathway	Measurable Parameter(s) and Units of Measurement
Change to Apitipi Anicinapek Nation's Indigenous and Treaty Rights	<ul style="list-style-type: none"> • Alteration to the current use of land and resources for traditional purposes • Alteration to the current and future quality, quantity, or distribution of country foods and other harvested resources (e.g., species of cultural importance, medicinal plants) • Alteration of habitat supporting harvested resources • Alteration to harvesting methods, timing, or seasonality • Alteration of access routes or ability to travel to or through preferred use areas/sites of interest (e.g., highways, travel ways, navigable waterways and waterbodies) • Increased access by non-Indigenous harvesters or land users • Disruptions to the exercise of Indigenous or Treaty rights associated with Project workforce • Increased sensory disturbance (e.g., change in noise levels, air quality, traffic) and/or alterations of necessary conditions (i.e., factors that influence the quality of experience or conditions for use or access such as visual quality, peaceful enjoyment, level of sensory disturbance) 	<ul style="list-style-type: none"> • Quantitative and qualitative consideration of available habitat for harvested resources • Quantitative and qualitative consideration of availability of harvested resources • Quantitative and qualitative consideration of total area of accessible land and ability to access preferred travel routes, including watercourses. • Qualitative consideration of preferred methods, timing, and seasonality of use • Qualitative consideration of factors contributing to lost or altered access, opportunities, and quality of experience (e.g., increased highway traffic and type, changes in visual aesthetic, perceptions of land and health quality) • Qualitative consideration of cultural connections to a particular species or place • Quantitative considerations of distance from communities of residence • Quantitative and qualitative considerations of population and workforce • Qualitative consideration of the distribution of disproportionate effects on diverse populations of the Nation's membership • Other changes or concerns raised by Apitipi Anicinapek Nation

Potential Effect	Effect Pathway	Measurable Parameter(s) and Units of Measurement
Change in Apitipi Anicinapek Nation's Physical and Cultural Heritage ⁹	<ul style="list-style-type: none"> • Loss or alteration of physical and cultural heritage features, locations, or areas • Loss or alteration of use, access, value, quality of experience or required conditions (e.g., visual aesthetics; noise levels) of physical and cultural heritage features, locations, or areas • Loss or alteration of ability to maintain and transmit Indigenous Knowledge and culture (e.g., language, histories, stories, practices) to future generations. • Alteration to harvesting, habitation, and cultural or sacred locations or areas 	<ul style="list-style-type: none"> • Qualitative consideration of factors contributing to loss or altered use, access, and opportunities to transmit knowledge at physical and cultural heritage features, locations, or areas • Qualitative consideration of factors contributing to loss or altered value, quality of experience, or required conditions of physical and cultural heritage features, locations, or areas (e.g., perceptions of land health, visual aesthetic, resource quality) • Quantitative consideration of affected heritage and cultural sites and known preferred locations or areas of use • Qualitative consideration of the distribution of disproportionate effects on diverse populations of the Nation's membership • Other changes or concerns raised by Apitipi Anicinapek Nation
Change to Governance, Health, Social and Economic Conditions of Apitipi Anicinapek Nation	<ul style="list-style-type: none"> • Alteration to the current use of lands and resources for traditional purposes (includes harvesting sites, heritage and other cultural sites, and associated traditional activities) • Alteration of access to land, waterways, waterbodies, and preferred travel ways • Alteration to cultural transference opportunities • Direct or indirect alteration to Indigenous determinants of health (e.g., environmental, cultural, psychological, physical, spiritual, economic) • Alteration to decision making abilities regarding land and water, and ability to uphold cultural traditions, laws, and governance systems that inform how rights are exercised. • Disruptions associated with Project workforce. 	<ul style="list-style-type: none"> • Quantitative and qualitative consideration of total area of accessible land and ability to access preferred travel routes, including watercourses • Quantitative considerations of distance from communities of residence • Qualitative consideration of factors contributing to lost or altered access, opportunities, and quality of experience (e.g., increased highway traffic and type). changes in visual aesthetic, change in noise levels, perceptions of land and health quality) • Qualitative consideration of known stewardship areas, land use or management plans, preferred lands and resources • Qualitative consideration of known Indigenous land-based economic activities • Qualitative consideration of capacity of accommodations, health care and social services, emergency services, and other services and amenities • Quantitative and qualitative considerations of population and workforce

⁹ Canada Nickel understands that changes to physical and cultural heritage and structures, sites, or things of historical, archaeological, paleontological, or architectural significance consider all elements of cultural and historical importance to Indigenous communities, in addition to provincial heritage legislative requirements. Canada Nickel also understands that there are tangible and intangible elements of physical and cultural heritage such as Indigenous language, storied places, place names, sacred, ceremonial or culturally important places, and cultural landscapes. For these reasons, Canada Nickel has considered physical and cultural heritage as a multidimensional concept that is not limited to particular sites or objects and can include components of the environment identified by Indigenous Peoples as having heritage value.

Potential Effect	Effect Pathway	Measurable Parameter(s) and Units of Measurement
	<ul style="list-style-type: none"> • Alteration to the quality, quantity, or distribution of harvested resources • Alteration to subsistence-based livelihoods • Alteration to demands on community services • Alteration to Indigenous economic activities such as guiding, tourism, and recreation 	<ul style="list-style-type: none"> • Qualitative consideration of opportunities for and perspectives on Project benefits, including employment, training, contracting • Quantitative and qualitative consideration of capacity of existing Indigenous workforce and businesses to provide supplies and services required for the Project • Qualitative consideration of the distribution of disproportionate effects on diverse populations of the Nation's membership • Other changes or concerns raised by Apitipi Anicinapek Nation

25.1.6 Boundaries

25.1.6.1 Spatial Boundaries

The assessment areas are defined by spatial boundaries that consider the geographic extent over which Project activities may affect Apitipi Anicinapek Nation and are illustrated in Figure 25.1 to Figure 25.2.

The spatial boundaries considered for this assessment are based on the Project components and activities, which include:

- **Project Area (PA):** encompasses the Project footprint and is the anticipated area of physical disturbance associated with the construction, operation, and decommissioning of the Project. The PA includes the Open Pit, the Stockpiles and Impoundment Facility, the Ore Processing Components, the Tailings Management Facility (TMF), the Water Management Facilities and Drainage Works, and other mine related infrastructure, as well as ancillary facilities and infrastructure outside the care and control of Canada Nickel (i.e., the new rail spur line, the Highway 655 realignment and the 500 kilovolt (kV) Transmission Line). The extent of the PA for the Project is shown on Figure 25.1 to Figure 25.2.
- **Modelled Mine Boundary (MMB):** the modelled mine boundary is an area around the PA that Canada Nickel will own, lease, or have agreements in place with the owners and/or Indigenous Nations that would enable Canada Nickel to restrict access to areas within the MMB, if required. Within the MMB, any seasonal or permanent housing will be avoided. The MMB is an approximated buffer around the PA like those at other mines and industrial areas in the region that will be established for enhanced safety and security around the PA.
- **Local Study Area (LSA):** the Indigenous Interests LSA consists of a 10 km buffer around the PA (Figure 25.1 to Figure 25.2) that encompasses the geographic extent over which direct (e.g., habitat loss) and indirect (e.g., sensory disturbance) effects may reasonably be expected to occur. Interactions identified within the LSAs of supporting VCs that overlap with the Indigenous Interests LSA are considered in turn throughout this assessment (e.g., geology and geologic hazards; soil; atmospheric environment; acoustic environment; groundwater; surface water;

vegetation, riparian and wetland environment; fish and fish habitat; birds and bird habitat; wildlife and wildlife habitat; climate change; health; social conditions; economics). This LSA definition does not preclude consideration of interactions beyond the Indigenous Interests LSA, as identified through Indigenous engagement.

- **Regional Study Area (RSA):** the Indigenous Interests RSA consists of a 50 km buffer around the PA (Figure 25.1 to Figure 25.2). The RSAs of those supporting VCs identified above for the Indigenous Interests LSA provide the regional context for the predicted effects of the Project within the Indigenous Interests RSA. It is also the area within which potential cumulative effects - the residual effects from the Project in combination with those of past, present, and reasonably foreseeable projects – may extend. This Indigenous Interests RSA definition does not preclude consideration of interactions beyond the Indigenous Interests RSAs, as identified through Indigenous engagement.

VC-specific LSAs and RSAs are described and illustrated in each VC chapter.¹⁰

The following Nation-specific assessment areas are considered for the assessment of effects on Indigenous interests as applicable and as described below:

- **Treaty 9 Territory:** Covers approximately two-thirds of Ontario's total landmass (~58,676,063 hectares [ha]),¹¹ spans from the Great Lakes watershed encompassing the Hudson Bay and James Bay drainage basins. This spatial area is considered for the assessment of effects on Apitipi Anicinapek Nation (Section 25.4, Figure 25.1).
- **Apitipi Anicinapek Nation Traditional Territory:** comprises the lands and waters stretching north along both sides of the Ottawa River and to the area around Lake Abitibi and the Harricana River, in the district of Cochrane in Northern Ontario, within Treaty 9 (AAN 2024a). This spatial area is considered for the assessment of effects on Apitipi Anicinapek Nation (Sections 25.4 and 25.5).

The Apitipi Anicinapek Nation reserve, Abitibi 70, is a smaller component of its Traditional Territory that was created in 1906 through Treaty 9 (CIRNAC 2024, GoC 1964, AAN 2024a). Abitibi 70 is on the south shore of Lake Abitibi and has an area of 7,770.10 ha (CIRNAC 2024, AAN 2024a). Abitibi 70 is approximately 95 km east of the PA and is the Nation's nearest land base (Figure 25.1 to Figure 25.2).

As noted above, the spatial boundaries selected for the Impact Statement do not preclude the consideration of potential Project interactions with broader territorial practice or exercise of rights. All information shared with Canada Nickel is evaluated in the context of the Project and incorporated into the Impact Statement, as appropriate. As additional information is brought forward by Apitipi Anicinapek Nation, Canada Nickel will evaluate potential interactions in the context of the Project and the Impact Statement.

¹⁰ See Chapters 10 to 24.

¹¹ Information about the total land area encompassed by Treaty 9 is provided as an approximation for the purpose of this assessment. The total land area is based on the James Bay Treaty - Treaty No. 9 document (GoC 1964) and information available on the Aboriginal and Treaty Rights Information System. The total land area encompassed by Treaty 9 includes Treaty lands identified in 1905 as well as the adhesions made in 1929 and 1930.

Departures from the spatial boundaries, if any, are described in the Nation-specific assessments that follow, as informed by Canada Nickel's engagement with Apitipi Anicinapek Nation.

25.1.6.2 Temporal Boundaries

Temporal boundaries for this assessment address potential effects related to Indigenous interests during the Project's construction, operation, and decommissioning/closure phases over relevant timescales. These temporal boundaries are used in the assessment of residual effects and are also considered applicable for the assessment of cumulative effects related to Indigenous interests.

The Construction Phase will include the preparation of the site up to the point at which the first process plant has been commissioned and is ready to commence operations. This phase will include site preparation, physical construction, pre-production, and commissioning activities. Construction is anticipated to begin in the Main Zone and East Zone, and rock extracted at this time may be crushed into aggregate using a mobile aggregate crusher for use during the construction of roads and other infrastructure, as necessary. It is noted that additional construction will occur through the operations phases of the Project, and that this phase is defined by the start of ore processing.

The Operations Phase is focused on the active processing of ore and generation of concentrate for delivery to market, specifically operation of the process plant(s). Due to the sequential nature of the mine operations, the operations phase of the Project has been divided into three sub-phases based on the Open Pit extraction schedule and sequential operation of the two process plants.

Operations phase 1 can be defined as the time during which the first Process Plant is operational, where throughput ore processing capacity will be 60 kt/d (or 21.9 Mt/a). During operations phase 1, mining activities will include development of the Open Pit and extraction of ore. Blasts will be planned and implemented to optimize the number of explosives used and will be performed during daytime only. It is anticipated that there be a maximum of five blasts days per week. Ore and waste rock will be loaded and hauled from the Open Pit and stockpiled at the Impoundment Facility or one of the Ore Stockpiles. During operations phase 1, key mine components will be expanded to accommodate for the processing increase in operations phase 2. Construction activities will include an expansion to the workshop, office, and other ancillary buildings. To increase the capacity of the Process Plant, a second phase of the Process Plant (along with crushing equipment) will be constructed. The Process Plant expansion will be located immediately north of the existing Process Plant, while the Primary Crusher will be located at the southwest corner of the West Stockpile.

Operations phase 2 can be defined as the time upon which the Process Plant throughput will be 120 kt/d (or 43.8 Mt/a). During operations phase 2, mining activities will continue in a similar manner then in operations phase 1. It is estimated that 536 kt of material will be extracted daily (based on average annual extraction rates), of which 240 kt will be ore. During operations phase 2 (in Year 17), it is anticipated that mining of the Main Zone of the Open Pit will be completed, at which point the tailings deposition in the TMF will cease and the Main Zone pit will become the new tailings facility for the remainder of operations, starting in Year 18. Ore will continue to be extracted from the East Zone. At the end of operations phase 2, it is estimated that over 60% of the tailings will have been stored in the pit,

compared to less than 40% in the TMF, thus reducing the overall mine footprint. The construction of the North Driftwood Diversion Channel may also occur and/or continue during this phase.

Operations phase 3 can be defined as the time upon which pit mining operations cease. The Process Plant will continue to operate and will continue processing the two Ore Stockpiles. Ore processing activities and transport will be in line with those of operations phase 2.

Progressive rehabilitation of in active areas (e.g., Impoundment Facility, TMF, haul roads) will commence. As the mine advances from development to operations and throughout the operational phase of the Project, opportunities for progressive rehabilitation are possible. Further details on activities associated with progressive rehabilitation are outlined in the Conceptual Closure Plan (Appendix F of the Impact Statement).

The Decommissioning and Closure Phase will occur following the completion of ore processing. All Project operations will cease prior to the Phase, and active closure will commence. Active closure includes the removal of buildings, structures, and other infrastructure, as well as reclamation and site stabilization activities. Once complete, the Project will then enter a passive closure phase as the pit lake fills. During this time, closure monitoring and adaptive mitigation will occur. Following pit lake filling, the Project site will be permanently closed.

Activities completed during the Decommissioning and Closure Phase of the Project are focused on reclaiming the environments, establishing physical, chemical, and biological stability at the site, and to meet desired end land functions and uses. The requirements of a closure plan and of closing out a mining project are set out in the *Ontario Mining Act*, R.S.O. 1990, c. M.14 and the Mine Rehabilitation Code of Ontario, as set out in Ontario Regulation (O. Reg.) 35/24. As a requirement of O. Reg. 35/24, the Mine Development Closure Plan will discuss rehabilitation activities that are to be implemented during a temporary suspension of mining, during a state of inactivity, and to achieve final close out. A Conceptual Closure Plan (Appendix F) has been prepared to support the Impact Statement and provides preliminary details on the progressive rehabilitation and closure plans for the Project to demonstrate Canada Nickel's commitment to responsible development and planning the Project with closure in mind in Phase 3 of the Impact Assessment process.

Progressive reclamation throughout the course of the mine life will occur, however most of the closure activities will commence at the cessation of mining activities and will be completed five years after ore processing ceases. Closure activities can be divided into passive and active phases. Closure activities planned during the active phase are expected to take place within the first five years of the decommissioning and closure phase, after ore processing activities cease; however, some activities may commence at the end of operations phase 2, when ore extraction ceases. Following the removal of major site infrastructure and rehabilitation of mine features, the site will transition into passive closure monitoring and maintenance to confirm reclamation efforts are established and functioning as intended. During the passive phase, emphasis will be placed on water quality monitoring, the ongoing filling of the Open Pit with water to create a pit lake, performance monitoring of the completed closure work, and maintenance, as required. Through preliminary modelling, it is predicted that filling the Open Pit with water may require more than 100 years. Although not part of the base case, if beginning in Year 42 the TMF drainage area was diverted to drain into the pit to accelerate pit filling, the pit is predicted to be filled

in 65 years. Ongoing closure monitoring and maintenance activities will therefore be carried out throughout the active and passive closure phases until the closure objectives have been satisfied and the Project has been moved to a closed out and abandoned status.

The temporal boundaries for the assessment of effects on Indigenous rights and interests include the following:

- Construction (Year -3 to Year -1)
- Operations
 - Operations phase 1 (Year 1 to Year 5): 60 kilotonnes per day (kt/d) milling capacity with ore extraction
 - Operations phase 2 (Year 5 to Year 30): 120 kt/d milling capacity with ore extraction
 - Operations phase 3 (Year 30 to Year 41): 120 kt/d milling capacity with no ore extraction
- Decommissioning and closure
 - Active closure (Year 41 to Year 46)
 - Passive closure (Year 46+)

Additional descriptions of the activities and physical work anticipated to occur during each phase are provided in Section 25.3.¹²

25.1.7 Residual Effects Characterization

Residual effects on Indigenous interests have been conservatively overestimated with consideration for the interconnectedness of the effect pathways that may affect those interests. The analysis in Section 25.2 is informed by the results from relevant VCs and feedback received from Apitipi Anicinapek Nation; however, potential effects on those VCs may not appear to fully align (i.e., be clearly associated with) with effects on Indigenous interests. As a result, the characterization of residual effects on Indigenous interests (i.e., the severity of the impacts) may often be ranked higher than the residual effects characterized for related VCs, specifically, duration, magnitude, and timing given the typically more expansive view of effects by First Nations.

Criteria used to characterize residual effects on Indigenous interests are provided in Table 25.2. Departures from the characterization attributes or approach, if any, are described in the Nation-specific assessment that follows, as informed by Canada Nickel's engagement with Apitipi Anicinapek Nation.

¹² Project phases and activities are also described in Chapter 3.

Table 25.2 Characterization of Residual Effects on Indigenous Interests

Characterization	Quantitative Measure or Definition of Qualitative Categories
Direction	<p>Positive – an effect that moves measurable parameters in a direction beneficial to the Indigenous interest relative to existing conditions</p> <p>Adverse – an effect that moves measurable parameters in a direction detrimental to the Indigenous interest relative to existing conditions</p> <p>Neutral – no net change in measurable parameters for the Indigenous interest relative to existing conditions</p>
Magnitude	<p>Negligible – no measurable change</p> <p>Low – effect may increase the effort necessary but will not reduce the ability to exercise or practice the Indigenous interest</p> <p>Moderate – effect may reduce but not eliminate the ability to exercise or practice the Indigenous interest</p> <p>High – effect will greatly reduce or eliminate the ability to exercise or practice the Indigenous interest</p>
Geographic Extent	<p>PA – residual effects are restricted to the PA</p> <p>LSA – residual effects extend into the LSA(s)</p> <p>RSA – residual effects extend into the RSA(s)</p>
Timing	<p>Not Applicable – seasonal aspects are unlikely to affect residual effects on the Indigenous interest</p> <p>Applicable – seasonal aspects may affect residual effect on the Indigenous interest</p>
Duration	<p>Short-term – residual effect restricted to the construction phase (1 to 3 years), or the decommissioning and active closure phase (1-5 years)</p> <p>Medium-term – residual effect extends into the operations phase (41 years)</p> <p>Long-term – residual effect extends beyond the operations phase (> 41 years) and beyond the decommissioning and passive closure phase (> 46 years)</p>
Frequency	<p>Single event – effect occurs once</p> <p>Multiple irregular event – occurs at no set schedule</p> <p>Multiple regular event – occurs at regular intervals</p> <p>Continuous – occurs continuously</p>
Reversibility	<p>Reversible – the effect is likely to be reversed after activity completion and reclamation</p> <p>Irreversible – the effect is unlikely to be reversed</p>

25.1.7.1 Context and Resilience

The characterization of every residual Project effect inherently considers the effects of past and present projects and activities, and potential trends in the condition of the Indigenous interest, as applicable. Literature reviewed, and feedback received from Apitipi Anicinapek Nation describes historical, ongoing, and future development as modifications to the existing conditions of Indigenous interests.

Resilience is notionally understood as the ability of a receptor to recover from or adapt to a change, real or perceived, in its environment. The degree of resilience may be measured or characterized for species or ecosystems relied upon by Indigenous Peoples for the exercise of their rights, traditional activities, and practices. Such characterization may be relevant and incorporated into this assessment, where noted, given the interdependence of community health, wellbeing and culture and the health and availability of the land and water. However, the ability of Indigenous Peoples to recover from or adapt to environmental effects of the Project remains contingent on personal, cultural, esthetic, or spiritual values that are subjective and cannot be meaningfully reduced to assessment criteria. When applied to human receptors, resilience in this sense, or as a concept overall, is viewed as Nation-specific, as it is informed by an Indigenous persons' lived experience, individually and/or collectively in their social and community groups. It would not be appropriate given the subjective and complex nature of these considerations for anyone but the affected party to characterize resilience. As such, the "context" or "resilience" criterion is not carried forward for the assessment of Project effects on the collectively held rights and interests of Apitipi Anicinapek Nation.

The more commonly understood and accepted criteria defined for this assessment are: (1) consideration for disproportionate effects on vulnerable populations, (2) the views of the Indigenous Nation regarding existing environmental, social, or economic barriers, and (3) the preferred conditions required by the Indigenous Nation to maintain or enhance their rights and interests. These criteria are viewed as sufficient to assist the federal and provincial regulators in determining the overall seriousness of the Project effects on the Indigenous interests.

25.1.8 Mitigation Measures

Mitigation and enhancement measures described throughout this Impact Statement are proposed to reduce adverse residual effects and enhance positive effects on Indigenous rights and interests, as applicable, and are discussed relative to specific potential effects for each of the identified Indigenous rights and interests in Section 25.4. The following criteria were applied for the selection of mitigation and enhancement measures specific to the Indigenous interest assessment:

- Their effectiveness to limit Project interactions that affect Indigenous rights and interests during all Project phases
- Technical and economic feasibility to manage each specific pathway of effect
- Consideration of relative level of uncertainty or risk associated with the accommodation, mitigation (including differentiated measures, if applicable), and complementary option
- Consideration of timing of Indigenous activities on the land
- Their inclusion on similar mining projects in the region
- Consideration of potential regional implications of applying Project-specific mitigation and enhancement measures (e.g., interactions with initiatives of other projects), considering any reasonably foreseeable development in the area
- Apitipi Anicinapek Nation recommendations and identification of preferred mitigation
- Perspectives of Apitipi Anicinapek Nation on the effectiveness of the mitigation measures

- Project's benefits for Apitipi Anicinapek Nation
- Professional judgment of the effects assessment team

The mitigation or enhancement measures, review processes, or monitoring initiatives specific to Indigenous rights and interests are described in Sections 25.4 and 25.5 and Attachment 25.1.

25.1.9 Analytical Assessment Techniques

The assessment of adverse residual effects resulting from the Project on Indigenous interests is based on a comparison of the existing conditions for these interests without the Project and how these interests would be exercised or practiced with the Project in place. Where specific information on an Indigenous interest was not provided to Canada Nickel at the time of writing, conclusions have been based on publicly available information (see Section 25.1.4 for more detail on sources) and the understanding that Indigenous interests may be exercised or practiced on accessible lands and waters throughout the Treaty 9 land base (GoC 1964), and traditional territories and/or areas of interest of Apitipi Anicinapek Nation. For greater certainty, this assessment applies a conservative approach that recognizes that an absence of information regarding Indigenous interests does not necessarily represent an absence of an interests and that, for example, resources or species identified as being present near the Project could be hunted, trapped, fished, or gathered by Apitipi Anicinapek Nation, even if Apitipi Anicinapek Nation did not identify specific sites, areas, or resources in relation to this Project assessment. This assessment also recognizes that the nature of Indigenous interests may change over time and in location. As such, this assessment conservatively assumes that Indigenous interests have the potential to occur anywhere on accessible lands and waters within Project assessment areas that overlap with the Traditional Territory of Apitipi Anicinapek Nation. This assessment reflects the best available information regarding Indigenous interests in relation to the Project. Canada Nickel has worked with Apitipi Anicinapek Nation to review and validate the results of this assessment.¹³ Feedback received has been incorporated into the assessment.

The analysis in this section incorporates and hence is supported by the findings of the VC assessments found in the Impact Statement that are relevant to Indigenous interests; however, potential effects for those VCs may not fully align with effects on Indigenous interests, nor do the mitigation measures for potential effects on those VCs necessarily mitigate the effects on Indigenous interests. As such, the characterizations, such as, duration, magnitude, and timing, may be ranked differently than those used to characterize related VCs. These differences were considered when evaluating the need for additional measures or plans to avoid, reduce, or otherwise manage adverse residual effects on Indigenous interests (as identified in Section 25.4).

25.1.10 Significance of Adverse Federal Effects Characterization

The Impact Statement must characterize the extent of significance of any residual adverse federal effect, which includes residual adverse effects within federal jurisdiction and any adverse direct or incidental effects as defined in section 2 of the IAA.

¹³ These efforts are also described in Chapter 7 (Description of Engagement with Indigenous Peoples).

Among the likely effects of the Project on Indigenous interests, those that are “adverse federal effects” (i.e., adverse effects within federal jurisdiction and any direct or incidental effects) per section 2 of the IAA (under definition of “effects within federal jurisdiction”) include:¹⁴

- an impact – occurring in Canada and resulting from any change to the environment – to Indigenous Peoples, such as to physical and cultural heritage, the current use of lands and resources for traditional purposes or any structure, site or thing that is of historical, archaeological, paleontological or architectural significance
- any change occurring in Canada to the health, social or economic conditions of Indigenous Peoples

Canada Nickel recognizes that Indigenous Nations are best suited to determine culturally appropriate methodologies and thresholds for assessing potential effects and characterizing the extent of significance of adverse federal effects (i.e., the severity of the impacts) from an Indigenous perspective (IAAC 2023c).

The extent of significance of adverse federal effects are characterized using a negligible, low, moderate or high ranking-system (IAAC 2023c). For this assessment, the extent of significance characterization is as follows:

- A residual adverse effect of high extent of significance is one that, following the application of avoidance and mitigation measures, contributes to an exceedance of an established or conservation-based threshold required for the current use of lands and resources for traditional purposes, or is likely to create a change or disruption that interferes with physical and cultural heritage, any structure, site or thing that is of historical, archaeological, paleontological or architectural significance, or the health, social or economic conditions of Indigenous Peoples to a point where cultural activities and practices would be eliminated or meaningfully impaired.¹⁵
- A residual adverse effect of moderate extent of significance is one that, following the application of avoidance and mitigation measures, may reduce but not eliminate the current use of lands and resources for traditional purposes, physical and cultural heritage, any structure, site or thing that is of historical, archaeological, paleontological or architectural significance, or the health, social or economic conditions of Indigenous Peoples to point where they cannot continue at or near current levels and where accommodation and/or compensation is possible.
- A residual adverse effect of negligible/low extent of significance is one that, following the application of avoidance and mitigation measures, is not likely to interfere with the current use of lands and resources for traditional purposes, physical and cultural heritage, any structure, site or thing that is of historical, archaeological, paleontological or architectural significance, or the health, social or economic conditions of Indigenous Peoples.

¹⁴ See Chapter 8 (Assessment Methodology).

¹⁵ Contextually determined through any combination of the effect characterization attributes most applicable to one or more adverse federal effect, the concerns raised and status of the concerns, and the perspectives of Apitipi Anicinapek Nation regarding its preferred conditions or thresholds regarding the extent of significance of adverse federal effects.

The extent of significance of adverse federal effects is characterized in Section 25.6 for those effects that remain following the implementation of avoidance, mitigation, and enhancement measures.

25.2 Existing Conditions

Apitipi Anicinapek Nation completed the following Project-specific studies:

- Apitipi Anicinapek Nation Canada Nickel Company Crawford Nickel Project Indigenous Knowledge, Land Use and Occupancy Study (AAN 2024a).
- Draft Apitipi Anicinapek Nation Socio-Economic Study for the Crawford Nickel Project Impact Statement (AAN 2024b)

The results of these studies have been incorporated below. Canada Nickel's responses to the concerns raised and recommendations made by Apitipi Anicinapek Nation are provided in Attachment 25.1 of this chapter.

25.2.1 Rights, Governance and Legal Characteristics

Following review of a draft of this chapter, Apitipi Anicinapek Nation stated that the Nation has formally asserted the right to jurisdiction over its territory, including the lands where the project will be, as set out in the court case in the Ontario Superior Court initiated in June 2023 (Court File # CV-23-00701700-0000). After filing the court case, Apitipi Anicinapek Nation, along with the other plaintiff First Nations, sent a letter to federal and provincial Crown ministries, including the Ministry of Mines, clarifying that their asserted right increases the scope of the duty to consult and accommodate these First Nations under Canadian law to the point where their consent is required for projects within their Traditional Territories.

Apitipi Anicinapek Nation is a signatory of Treaty 9.

The Project is located within the boundaries of Treaty 9 (also known as the James Bay Treaty) (GoC 1964). Treaty 9 was signed between 1905 and 1906 by Anishinaabe (Algonquin and Ojibwe) and Omushkegowuk Cree communities and the Canadian Crown (CIRNAC 2013, GoC 1964; GovOnt n.d.). Approximately two-thirds of Ontario's total landmass (~58,676,063 ha) is covered by Treaty 9, which spans the Great Lakes watershed encompassing the Hudson Bay and James Bay drainage basins (GoC 1964). The rights specified under Treaty 9 are protected under section 35 of the *Constitution Act*, 1982.

While Treaty 9 does not specifically mention practices such as gathering, Canada Nickel understands these activities to be reasonably equivalent or incidental to the expressed harvesting rights and are a means of earning a livelihood before the signing of Treaty 9 that would continue in a similar manner after the signing of the Treaty (GoC 1964; SCC 1990, 1996, 1999a, b).

Apitipi Anicinapek Nation signed Treaty 9 in 1906 and holds section 35 rights under the *Constitution Act*, 1982. Apitipi Anicinapek Nation is part of the Anicinape Nation and is politically affiliated with the Algonquin Anishinabeg Nation Tribal Council in Québec and the Political Territorial Organization, Nishnawbe Aski Nation in Ontario (GoC 1964; AAN 2023a, 2024a).

Historically, Apitipi Anicinapek Nation was part of a larger Nation, along with the Pikogan in Québec, but were separated in 1906 into the Abitibi Ontario Band and the Abitibi Dominion (Québec) (AAN 2023a). The Abitibi Ontario Band had then changed its name to Wahgoshig First Nation in 1979 and then from Wahgoshig First Nation to Apitipi Anicinapek Nation in 2022 (AAN 2023a).

Consistent with the court case described at the introduction to this section, and established practice in Apitipi Anicinapek Nation, the Nation has adopted its Engagement and Consent Law to revise and update its previous Consultation and Accommodation Policy (AAN 2023a, 2024a; IAAC 2024). This law was developed in part due to the lack of consent and consensus procedures relative to the *Mining Act* and Apitipi Anicinapek Nation decision making processes and protocols specific to its Traditional Territory (IAAC 2024). The Engagement and Consent Law provides direction to industry and other governments about how Apitipi Anicinapek Nation must be engaged on projects that affect the Nation's Treaty rights (AAN 2023a, 2024a). The Engagement and Consent Law was used in the technical review draft Indigenous Engagement and Partnership Plan (IEPP) for the IA in response to the Project, submitted March 1, 2023, to IAAC (AAN 2023b). This has been used by Canada Nickel to engage and consult Apitipi Anicinapek Nation throughout the IA process.

Apitipi Anicinapek Nation governs its members in accordance with its customs, values and principles, laws and Anicinape legal orders within the Spirit and Intent of *Minopimatisi8in* (the good life – the core of the governing system) (AAN 2023a, 2024a). The Nation's Indigenous Knowledge and Anicinape legal orders, political organization, history, social norms, language, economy, health, and culture are intricately connected to the Nation's traditional governance system (AAN 2023a). Apitipi Anicinapek Nation also operates under a custom electoral system that was amended in 2024; it comprised of a Chief and five Councillors; council positions are held for four years (CIRNAC 2024).

Apitipi Anicinapek Nation reported that there are existing stressors on its member's abilities to hunt and harvest and engage in cultural activities due to the impacts of colonization and development, such as the number of drill sites and access roads in their Traditional Territory (AAN 2024a, b; IAAC 2024). The ability to spend time on the land was reported by Apitipi Anicinapek Nation to be crucial for mental peace and connection to traditions, and the community is concerned that this will become more challenging with an increase in local industry and environmental changes in the region (AAN 2024b). Apitipi Anicinapek Nation expressed concerns regarding the cumulative effects from mining, forestry, hydro power, agriculture (e.g., herbicide spraying), and linear infrastructure on member's abilities to exercise their Indigenous and Treaty Rights and continue with their way of life (AAN 2024a, b; IAAC 2024). Apitipi Anicinapek Nation also expressed concern regarding the cumulative effects of declining fish populations, water quality and quantity, and sickness in animals (e.g., moose) on its members abilities to exercise their rights (AAN 2024a, b). Apitipi Anicinapek Nation has observed a correlation between declining moose health and currently active and closed mines in the greater region, such as the Black Fox Mine (McEwan Mining Inc.), Detour Lake Gold Mine (Agnico Eagles Mines Ltd.), Hoyle Pond Mine (Newmount Corp.) and Kidd Creek Mine (Glencore PLC) (AAN 2024b). Furthermore, Apitipi Anicinapek Nation expressed that environmental degradation from mining development and the use of pesticides have made some traditional food sources unsafe to consume, including, but not limited to, moose, caribou and whitefish (AAN 2024b) Apitipi Anicinapek reported these cumulative effects impact the community's diet, health, and ability to engage in cultural practices (AAN 2024b).

25.2.1.1 Land Management, Claims, and Agreements

Apitipi Anicinapek Nation's Traditional Territory stretches north along both sides of the Ottawa River and to the area around Lake Abitibi and the Harricana River, in the district of Cochrane (AAN 2023a). Apitipi Anicinapek Nation stated that it has used the lands within its Traditional Territory since time immemorial and its members depend on a deep connection with their land to support their spiritual, cultural, and economic life.

The Apitipi Anicinapek Nation reserve, Abitibi 70, is a smaller component of its Traditional Territory that was created in 1906 through Treaty 9 (CIRNAC 2024; GoC 1964; AAN 2024a). Abitibi 70 is on the south shore of Lake Abitibi and comprises 7,770.10 ha (CIRNAC 2024; AAN 2024a). Abitibi 70 is approximately 95 km east of the PA and is the Nation's nearest land base (Figure 25.1 to Figure 25.2).

Apitipi Anicinapek Nation's Land and Resources Department (AAN-LRD) is responsible for preserving and safeguarding the health of the land within the Nation's Traditional Territory (AAN 2023a). The AAN-LRD also maintains data on the Nation's historical and present land use through collaboration with archaeologists and by recording oral history. The AAN-LRD supports the Nation's ability to exercise its inherent /Treaty rights and its members close relationship with land for current and future generations. The AAN-LRD monitors land use and developments within its Traditional Territory to help develop connections between industry proponents and Nation members and to uphold the protection of its lands and Treaty and Aboriginal rights (AAN 2023a). The AAN-LRD is starting to prepare a land use plan for the reserve that will set out a long-term vision for land use and infrastructure (e.g., houses, commercial areas, roads, utilities, cultural spaces) that will support community growth (AAN 2023a). This process is being led by a planning team that consists of an AAN Planning Coordinator, AAN Lands Advisory Committee, and a consulting team (AAN 2023a). Funding and training are provided through the National Aboriginal Land Managers Association (AAN 2023a).

There are no active Specific Claims involving Apitipi Anicinapek Nation (GoC RCSC 2023).

25.2.2 Population and Demographics

As of February 2024, Apitipi Anicinapek Nation had a registered population of 444 members. Approximately 145 members (83 male and 62 female) live on reserve and 12 members live on other reserves (five male and seven female). Two members live on Crown land, (one male and one female). Approximately 285 members (146 male and 139 female) live off reserve (CIRNAC 2024).

25.2.2.1 Language

Apitipi Anicinapek Nation members speak three languages, including Anicinabemo8in (Algonquin/Anicinape), Cakanacimo8in (English), and 8emitikocimo8in (French) (AAN 2023a, 2024a). One of the objectives of the Nation's Cultural Department is to revitalize and restore traditional language use (AAN 2023a, 2024a). Although language revitalization efforts are underway within the community, Apitipi Anicinapek Nation members highlighted the importance of creating forward-looking opportunities and its need for additional resources for the community to access and learn their language, especially for the younger generations (AAN 2024a, b).

As of 2016, approximately 20 members of Apitipi Anicinapek Nation identified that they speak Indigenous languages, 125 speak only English and 25 speak both English and French (CIRNAC 2024).

25.2.2.2 Education

Apitipi Anicinapek Nation's vision for its community is that all children are nurtured by its strong culture and traditions through teachings shared by Elders and their families and its larger community (AAN 2023a).

Apitipi Anicinapek Nation's Education Department provides several educational services for its members. The Education Department's mandate is to make sure that every community member can have access to education and that students are able to have real world job experience (AAN 2023a, 2024b). The Nation seeks to financially sustain its own education programs in its community, including through the allocation of benefit agreements, funding from CIRNAC, or other agencies and organizations (AAN 2023a, 2024b).

An early year (ages 0 to 8) program is offered on reserve that is jointly administered by the Nation's Education and Health Departments (AAN 2023a). Elementary and secondary school services are also available through partnerships with the Joseph H. Kennedy Public Highschool, and the Iroquois Falls Secondary School located off reserve (AAN 2023a). The Nation's Education Department brings cultural events and awareness to these schools and collaborates with faculty and administrators towards the development and implementation of strategies to support Apitipi Anicinapek students (AAN 2023a).

Approximately 125 members of Apitipi Anicinapek Nation aged 15 years or older reported their education status for the 2021 Census (Statistics Canada 2023a). Of these respondents, 50 had an Ontario Secondary School Diploma (OSSD) or equivalent and 50 had a Postsecondary certificate or diploma below bachelor level, including 20 with an apprenticeship or trades certificate or diploma, and 20 with a Collège d'enseignement général et professionnel (CEGEP) also known as a General and professional teaching college in English, or other non-university certificate or diploma (Statistics Canada 2023a).

Apitipi Anicinapek Nation reported the need for an on-reserve school with a culturally appropriate curriculum to address high dropout rates among youth, who currently commute a far distance to access both an elementary and high school education (AAN 2024b). Apitipi Anicinapek Nation members added that land-based programming, for both youth and adults, is needed to reconnect the community with traditional practices (AAN 2024b).

25.2.3 Social Conditions and Services

Apitipi Anicinapek Nation is located approximately 79 km from the nearest service centre, Iroquois Falls, to which it has year-round road access. The nearest city is Timmins (CIRNAC 2024).

According to the 2016 census, there were a total of 55 dwellings on reserve; 40 of which were constructed more than 10 years ago and 15 were constructed within the past 10 years (CIRNAC 2024). Of these dwellings, 30 required minor repairs and 15 required major repairs (CIRNAC 2024).

Apitipi Anicinapek Nation has a Housing and Community Development Department that works with partners in the region to make sure that the Nation has affordable, suitable, and adequate housing (AAN

2023a). This is achieved through building new homes and completing minor and major repairs (AAN 2023a). The mandate of the Housing and Community Development Department is to:

- Administer and manage a seamless and timely building and planning review and approvals process (AAN 2023a)
- Tightly coordinate efforts between departments (AAN 2023a)
- Facilitate sound development and redevelopment in the community (AAN 2023a)
- Improve the quality of life for its people (AAN 2023a)

Apitipi Anicinapek Nation reported that it has made incredible strides in improving housing quality and affordability, thanks in part to funding from impact benefit agreements and the Canada Mortgage and Housing Corporation (AAN 2024b). However, the Nation noted that the community continues to face infrastructure challenges related to a shortage of housing and an insufficient energy infrastructure (AAN 2024b). Overcrowding and long waitlists for housing underscore the urgent need for new housing developments, while consistent power outages during harsh winters pose serious risks, particularly to Elders (AAN 2024b). Apitipi Anicinapek Nation reported that a transition to a three-phase power system is vital to supporting new homes and the broader infrastructure needs of the community (AAN 2024b). The Nation further reported that while the quality of housing has improved, affordability remains a concern, with many residents unable to finance necessary repairs (AAN 2024b).

Abitibi Resources LP (ARLP) (formerly Wahgoshig Resources Inc.) is a company that supports economic development in Apitipi Anicinapek Nation's Traditional Territory and has an agreement with the community to maintain the roads during the winter months (AAN 2023a). ARLP have also assisted community members and contractors with clearing roads in the summer months to improve access to cabins along the lake front and have undertaken the upgrade of the North Road accessing Abitibi Lake (AAN 2023a). In July 2023, Apitipi Anicinapek Nation was identified as one of nine organizations and communities that would receive funding for the improvements to the access road from the Indigenous Transportation Initiatives Fund (AAN 2023b).

Apitipi Anicinapek Nation is one of 21 Unaffiliated Indigenous Nations in Ontario that use Ontario First Nations Technical Services Corporation (OFNTSC) for technical advisory services that are not provided through the Nation's affiliated Tribal Council (OFNTSC 2020). OFNTSC provides technical advisory services in the areas of emergency planning, engineering, environment, fuel system management, fire safety, housing, infrastructure, operations and maintenance, water, and wastewater (OFNTSC 2020). OFNTSC services were used for Apitipi Anicinapek Nation housing and general infrastructure maintenance projects within the community (OFNTSC 2020). Apitipi Anicinapek Nation was also listed as one of the communities that are a part of the OFNTSC HUB project (OFNTSC 2020). The HUB project works with the Nation's Public Works Department to monitor water and waste-water systems and related infrastructure and equipment on reserve (AAN 2023a; OFNTSC 2020). The aim of the HUB project is to minimize potential water treatment failures on reserve and so that the community's water-systems continue to meet the provincial drinking water regulations (AAN 2023a; OFNTSC 2020). No additional information was available on the OFNTSC website or Apitipi Anicinapek Nation website to indicate the Nation's involvement with any other projects or services with OFNTSC.

Apitipi Anicinapek Nation offers two programs for the community for children and youth. The first program is the Early Years Centre for preschoolers between ages three to six that are beginning Pre-Kindergarten and Kindergarten (211 Ontario North 2023a). The Early Years Centre's goal is to help prepare young children for school through programs and activities such as family gym time, arts and crafts, breakfast and circle time, and a pre-school library (211 Ontario North 2023a). The second program is the Youth Program for children and youth aged 12 and older (211 Ontario North 2023a). This program provides cultural and land-based activities, sports events, and other activities to promote learning and skills to empower youth (211 Ontario North 2023a). These programs are offered at the "Choose Life" building located in Matheson, Ontario (211 Ontario North 2023a).

Following review of a draft of this chapter, Apitipi Anicinapek Nation stated that Apitipi Child and Family Services has undergone restructuring and is now called Guardians of the Children. The Guardians of the Children Agency aims to support families in the community through several programming opportunities offered on reserve (AAN 2023a). The Guardians of the Children's goal is to promote growth, healing, and well-being of children and families through a wholistic approach (AAN 2023a). The Guardians of the Children has an active Facebook page for community members to access and learn about ongoing programs, and it is also in the process of developing a website to further support and reach community members seeking these services (AAN 2023a). The Guardians of the Children has an Emergency On-Call service for any members requiring immediate support on reserve (AAN 2023a).

In October 2021, Apitipi Anicinapek Nation created an Emergency Services Department to unify the encompassing emergency services available in the community (AAN 2023a). These services include:

- Emergency First Response Team to respond to medical emergencies on reserve (e.g., to stabilize individuals until paramedics arrive by ambulance) (AAN 2023a)
- Crisis Response Team to respond to nonmedical emergencies, wellness checks, mental health checks and referrals, and assisting clients with additional supports as needed on reserve (AAN 2023a)
- Fire Prevention and Response Services to provide educational services to the community and to respond to and /or monitor forest and residential fires that may occur on or near the reserve (AAN 2023a)

Security services to uphold security measures for commercial spaces on reserve (e.g., to check that systems are fixed and up to date; respond to alarms as needed) (AAN 2023a).

In addition to Apitipi Anicinapek Nation's Emergency Services Department offered on reserve, Nishnawbe Aski Police Services (NAPS) have a detachment located in Matheson, Ontario that provides services to Apitipi Anicinapek Nation as part of Nishnawbe Aski Police Services Northeast Region (NAPS n.d.). Nishnawbe Aski Police Services mission is to provide unique, effective, efficient, and culturally appropriate service to all the people of the Nishnawbe Aski area through partnerships with the communities they serve (NAPS n.d.). In January 2022, Nishnawbe Aski Police Services received a grant from Ontario's CCTV (closed-circuit television) Grant program to help deter criminal activity and improve public safety (Timmins Today 2022). The money received will be dedicated to accessing and installing CCTV systems to monitor suspected street gang members entering Northern Ontario Indigenous Nations

(Timmins Today 2022). The Nishnawbe Aski Police Services news release noted that Apitipi Anicinapek Nation (then known as Wahgoshig First Nation) had seen an increase in gang-related occurrences on reserve in 2022 (Timmins Today 2022). Although there is a limited police presence, Apitipi Anicinapek Nation members reported the community feels secure through community watch initiatives (AAN 2024b). Apitipi Anicinapek Nation reported that the lack of essential services and facilities, such as an upgraded health clinic, a grocery store, a school, and local businesses on reserve, further exacerbates the challenges faced by the community (AAN 2024b). The Nation stated that its infrastructure gaps hinder the community's growth, self-sufficiency and quality of life (AAN 2024). Apitipi Anicinapek Nation's desire for additional service buildings and improved roads reflects a broader vision for a more self-reliant and resilient community (AAN 2024b).

No additional information regarding traffic safety, sewage systems, railways, housing (e.g., affordability, suitability, availability), or social services (e.g., women's shelters) associated with Apitipi Anicinapek Nation was identified through the review of publicly available literature or through engagement with Canada Nickel.

25.2.3.1 Health

25.2.3.1.1 Conditions

Apitipi Anicinapek Nation emphasized the importance of maintaining and protecting the well-being and safety of its community (AAN 2022, 2023b, c, 2024a, b; IAAC 2023d). For other projects within its sacred Traditional Territory, the Nation previously identified that it has the right to maintain and protect community well-being and safety from; the risk of spills, accidents or malfunctions resulting from project construction, operation or decommissioning / closure that could affect the environment and human health (as defined broadly to include physical and mental health conditions) directly or indirectly (Wahgoshig First Nation, Odonaterra Inc. and Shared Value Solutions 2021).

Apitipi Anicinapek Nation reported that its relationship with the land and ability to participate in traditional harvesting practices is important to the health and well-being of the community (AAN 2024a, b). Apitipi Anicinapek Nation members reported that harvesting and consuming wild foods is beneficial, as wild foods are perceived as healthier than the processed foods found in grocery stores, noting that members that eat fewer wild foods tend to have increased predisposition to illness (AAN 2024a, b). Apitipi Anicinapek Nation members also described some of the positive spiritual and mental health outcomes that they achieve by being out on the land, and shared that time spent outside reflecting on their unique personal relationships with the land improved their mental well-being (AAN 2024a, b).

Apitipi Anicinapek Nation reported that the quality of on-reserve housing has been significantly improved in recent years due to industry and government funding for new development projects, however a shortage of housing and insufficient energy infrastructure in the community persists, with members noting the frequency of power outages can create risk for the community in the winter months (AAN 2024b). Apitipi Anicinapek Nation is currently developing renewable energy projects related to biomass heating and solar energy however the Nation requires an upgrade from the one-phase power system to a three-phase power system to support these initiatives (AAN 2024b). Apitipi Anicinapek Nation added that several members cannot afford housing repairs, causing the Nation to rely heavily on external funding

from the federal government to address urgent repairs (AAN 2024b). Furthermore, Apitipi Anicinapek Nation noted that drug addiction within the community is a significant concern, noting its links to intergenerational trauma caused by colonization, residential school and the 60's scoop (AAN 2024b). However, Apitipi Anicinapek Nation members also linked mental and physical well-being to the community's diet and overall health, noting the loss of access to traditional lands and food sources due to environmental degradation and industrial expansion has impacted spiritual well-being, cultural continuity and mental peace (AAN 2024b).

Apitipi Anicinapek Nation expressed concern regarding the following potential effects to health and well-being (IAAC 2023d, 2024; AAN 2024b):

- Impacts to human health, including actual and perceived risks at key receptors due to changes to noise levels, air quality, recreational and drinking water quality, proximity to transmission lines, and accessibility and contamination of country foods
- Impacts on social well-being from in and out migrations, including crime rates, addiction, mental health, impacts to women, girls, and 2SLGBTQQIA+, and discrimination and violence towards Indigenous Peoples
- Impacts to local community services and infrastructure, including women's shelters, health facilities, mental health and addiction facilities, emergency services, childcare, and housing availability and pricing
- Impacts from accidents and malfunctions during the life of the Project that could impact the natural environment and physical and mental health of Apitipi Anicinapek Nation members
- Cumulative loss of access to traditional lands and food sources may exacerbate existing physical and mental health challenges reported by Apitipi Anicinapek Nation members

Canada Nickel's responses and proposed mitigation measures for the concerns and recommendations made by Apitipi Anicinapek Nation are found in Attachment 25.1.

No information regarding health outcomes (e.g., chronic disease, mental health, addictions, rate of gender-based violence) or health factors (e.g., health-related behaviours; mental well-being in the community) associated with Apitipi Anicinapek Nation was identified through the review of publicly available literature or through engagement with Canada Nickel.

25.2.3.1.2 Services

Apitipi Anicinapek Nation members described a lack of essential services and facilities within the community, including an upgraded health clinic, a methadone clinic, a treatment and aftercare centre to support those struggling with addiction, dental and optometric care, and improved transportation for accessing healthcare centres (AAN 2024b). More supports for individuals dealing with mental health issues related to trauma was also reported as a priority (AAN 2024b).

Apitipi Anicinapek Nation has a Health Department that works to build a stable, sustainable, and safe community where Elders, adults, and children are free from fear, want, and harm (AAN 2023a). The Mandate of the Apitipi Anicinapek Nation Health Department is to:

- Provide health care services and programming to meet the needs of each member; physically, mentally, emotionally, and spiritually (AAN 2023a)
- Deliver intervention and prevention services (AAN 2023a)
- Implement emergency mandates from the Chief and council (AAN 2023a)

As noted previously in Section 25.2.3, Apitipi Anicinapek Nation also has an Emergency Services Department that unifies the emergency services such as Fire, an Emergency First Response Team, Crisis Response, and Security in the community (AAN 2023a, 2024b).

In addition to the services provided by the Health Department and Emergency Services Department, Apitipi Anicinapek Nation has the “Choose Life” program available for children and youth ages 0 to 18 (AAN 2023a, b). This program is funded by Nishnawbe Aski Nation (NAN) and provides various programming for youth including but not limited to ATV excursions, medicine picking, swimming, archery, school breakfast and lunch program, fishing harvesting, ceremonies, sewing for traditional events, mitts and moccasins, and beading (AAN 2023a). The Choose Life mandate is:

- Provide healthy, constructive, and educational activities for the youth of Apitipi Anicinapek Nation (AAN 2023a)
- Provide the youth with opportunities to reclaim their culture, connection to the land, Indigenous Knowledge, and traditional practices (AAN 2023a)
- Establish healthy, dependable relationships with the youth to provide a safe space (AAN 2023a)
- The overall goal of the Choose Life program is to provide healthy, constructive, and educational activities for the youth of Apitipi Anicinapek Nation (AAN 2023a)

The Apitipi Anicinapek Nation's Cultural Department (AAN-CD) also contributes to the mental wellbeing of Apitipi Anicinapek Nation members through their land-based programming, which is helping to address addictions and improve the mental health of community members young and old (AAN 2024a).

For all Apitipi Anicinapek Nation members, Nishnawbe Aski Nation also offers the Nishnawbe Aski Mental Health Wellness Support Access Program (NAN Hope) (NAN Hope 2024). This program is Nation-led and provides community members with access to mental health and addiction support including a 24/7 live answer toll-free telephone line, live webchat and text support, rapid access to confidential counselling, access to a 24/7 crisis/distress support line, and navigation to existing community-based and regional support services (NAN Hope 2024).

Other services available for Apitipi Anicinapek Nation members can be found at the Community Health Centre located in Matheson, Ontario (211 Ontario North 2023b). The Community Health Centre has a health clinic available where Apitipi Anicinapek Nation members can access services including adult, child, and family health; chronic disease management; communicable disease control; home visits; foot care clinics; health teaching; immunizations; long term care; prenatal and postnatal teaching; and well baby clinics (211 Ontario North 2023b). MedRuns, a transportation service organized by the Band Office, helps community members access their medical appointments for those without personal vehicles (AAN 2024b).

The National Native Alcohol and Drug Abuse Program (NNADAP), a Health Canada program controlled by Indigenous Nations, is also available at the Apitipi Anicinapek Nation Community Health Centre (211 Ontario North 2023c). Its services are available to any Apitipi Anicinapek Nation member and their families that are struggling with addiction issues (211 Ontario North 2023c). Apitipi Anicinapek Nation members can access services such as:

- Alcoholics Anonymous and Narcotics Anonymous meetings (211 Ontario North 2023c)
- Preventative programs including public seminars and meetings, cultural and spiritual events (211 Ontario North 2023c)
- Intervention measures including recreational activities and events, individual and group discussions, and cultural and spiritual gatherings (211 Ontario North 2023c)
- Aftercare services such as counselling, sharing circles, support groups, phone calls, and referrals to band services, social services, detoxification, and treatment centres for medical assistance (211 Ontario North 2023c)

Apitipi Anicinapek Nation also partners with Sweetgrass Health Centre (SGHC), which is an Aboriginal Health Access Centre (AHAC) that works to provide equal access to quality, culturally based holistic health care to First Nation, Métis, and Inuit individuals and their families (SGHC 2023). The programs and services provided at the Sweetgrass Health Centre support the traditional values encompassing the connectedness of emotional, spiritual, physical, and mental well-being (SGHC 2023).

Apitipi Anicinapek Nation members reported that although several social services are available in the community, additional medical services and travel assistance is needed (AAN 2024b).

Information about drinking water sources related to the Nation's health conditions is provided in Section 25.2.3. Information about recreational water sources of cultural importance to Apitipi Anicinapek Nation are described in Section 25.2. No additional information regarding health services (e.g., health providers and their capacity) associated with Apitipi Anicinapek Nation was identified through the review of publicly available literature or through engagement with Canada Nickel.

25.2.4 Economic Characteristics

As shared with the Agency through engagement on the Project, Apitipi Anicinapek Nation emphasized the importance of maintaining or improving the ability of members to earn a living and share the benefits produced by activities within its Traditional Territory (AAN 2022, 2023b, 2024b), which include:

- Apitipi Anicinapek Nations traditional economy
- Business development opportunities
- Employment opportunities
- Commercial activities, including ownership and revenue-sharing of the Project
- Joint ventures, access to business contracts and co-development and implementation of environmental, socio-economic, and cultural monitoring programs for the life of the Project

- Quality of life and living conditions for members
- Self-sufficiency of the community as a whole and its members
- Education and training
- Treaty land entitlements and other Apitipi Anicinapek Nation-owned land or land interests

Apitipi Anicinapek Nation's company, Apitipi Resources LP (ARLP; formerly known as Wahgoshig Resources Inc.), is based on the Nation's reserve (Abitibi 70) and aims to bring social, economic, and environmental benefits to its members (WRI 2023; ARLP 2024). The ARLP participates in the economic development of natural resources in the Nation's Traditional Territory, while maintaining and promoting the Nation's cultural and traditional way of life and above all, respecting the land (WRI 2023; ARLP 2024). By themselves, or together with its joint venture partners, the ARLP provides several services, including mining services, drilling, earthwork services, harvesting, and forestry management services (WRI 2023; ARLP 2024). Black Diamond Drilling provides mining companies throughout North-Western Ontario with exploratory drilling services (ARLP 2024). Black Diamond Forestry provides forestry services to Apitipi Anicinapek Nation and the Abitibi Greenstone Belt (ARLP 2024). Apitipi Anicinapek Trucking provides trucking services to mining and construction operations throughout North-Eastern Ontario (ALRP 2024).

Following review of a draft of this chapter, Apitipi Anicinapek Nation reported that the ARLP has a number of existing IBAs and expertise and experience in negotiating these agreements in the region. For example, this year, the ARLP entered into a joint-venture agreement with Moreau to provide above-ground infrastructure support to mining clients, and a partnership with Milestone Environmental Contracting Inc. to provide remediation, revegetation, tailings management and related services (ALRP 2024).

As shared with the Agency through engagement on the Project, Apitipi Anicinapek Nation expressed concern regarding potential effects to economic benefits, investment and inclusion for its members, including potential direct and indirect effects of the Project on local Indigenous businesses, opportunities and partnerships, and local economies (AAN 2023b, IAAC 2024). Canada Nickel's responses and proposed mitigation measures for the concerns and recommendations made by Apitipi Anicinapek Nation are found in Attachment 25.1.

25.2.4.1 Labour Force

As of 2016, 68.2% of Apitipi Anicinapek Nation's members were participating in the workforce, 54.5% were employed and 26.7% were unemployed (CIRNAC 2024). Of 110 members over 15 years old who reported; 10 were in agriculture and resource-based industries, 10 were in manufacturing and construction, 10 were employed in wholesale and retail industries, 15 were in health and education, 10 were in business services, 10 were in transportation and warehousing and 35 were engaged in other services (CIRNAC 2024).

25.2.4.2 Economic Development

Apitipi Anicinapek Nation reported that the Band Office is the primary employer of its members (AAN 2024b). The Band Office offers a range of jobs related to governance, manual labour, public works, and community services (AAN 2024b). Within the last five years, Apitipi Anicinapek Nation has observed a positive trend, with the creation of more internal opportunities resulting in more community members choosing to work in the Band Office instead of in mining or forestry (AAN 2024b).

Apitipi Anicinapek Nation stated that there is no shortage of on-reserve jobs, however, there is a lack of diversity in on-reserve employment options due to constrained funding from external bodies that prevent the Nation from exercising financial autonomy (AAN 2024b). While there is interest in entrepreneurship, Apitipi Anicinapek Nation members lack the financial support and local market to start new businesses (AAN 2024b). In addition, Apitipi Anicinapek Nation reported a desire for more education and training services in specialized skills, such as heavy equipment operation or carpentry, to support youth employment needs (AAN 2024b).

For those community members working off reserve in the mining industry, Apitipi Anicinapek Nation reported that they are drawn by opportunities for overtime pay and specialized training and that there are specific agreements in place with mining companies to prioritize hiring from the community, especially within Treaty 9 lands (AAN 2024b).

Apitipi Anicinapek Nation has a Skills Development Fund (AAN-SDF) that aims to create a clear path to employment and business prosperity for its members (AAN 2023a). The AAN-SDF's intent is to create, maintain and sustain ongoing strategic opportunities through the management, coordination, and monitoring of the training to employment plan (AAN 2023a). The AAN-SDF program is to provide cultural mentorship, knowledge sharing, academic upgrading, advanced employee skills, wholistic essential work readiness, life skills, pre-apprenticeship, and job specific training programs to enhance the skills of Nation members so they are prepared to enter the workforce, in particular, the mining, forestry, hospitality, and health sectors (AAN 2023a). The Mandate of the Apitipi Anicinapek Nation Skills Development Fund is to:

- Promote, engage, recruit, and retain an Indigenous local workforce through the development of individual training plans, essential life skills training, career readiness, technical training, mandatory training and introduction to trades training and apprenticeships (AAN 2023a)
- Build an Indigenous skilled workforce that meets the needs of Apitipi Anicinapek Nation existing agreements (resource development employment opportunities) (AAN 2023a)
- Provide relevant training opportunities for Apitipi Anicinapek Nation members to develop non-technical and confidence needed to achieve long-term rewarding employment and careers (AAN 2023a)
- Encourage, promote, and enhance culturally and innovative opportunities for growth and success in a variety of career paths (AAN 2023a)

- Support all Apitipi Anicinapek Nation members – especially those facing barriers to fully participate in the labor market to enter, adapt and remain in a changing workforce by providing guidance on how to access other social programs to remove non-training related barriers (e.g., substance abuse, mental health, childcare) (AAN 2023a)
- Make specific targeted efforts to engage the youth and women in the community (AAN 2023a).
- Support existing Indigenous entrepreneurs and encourage the development of new Indigenous businesses and services (AAN 2023a)

In February 2022, the Government of Canada's Federal Economic Development Agency of Northern Ontario (FedNor) allocated \$500,000 of a \$10.9 million investment to Apitipi Anicinapek Nation to support its communities that were affected by COVID-19 (GoC FedNor 2022a). The funds will be used by Apitipi Anicinapek Nation to build a community playground and establish an outdoor market space to promote healthy and active living in green spaces (GoC FedNor 2022a).

Apitipi Anicinapek Nation also received approximately \$256,925 from FedNor's Community Investment Initiative for Northern Ontario in May of 2022 (GoC FedNor 2022b). This funding will support Apitipi Anicinapek Nation in modernizing businesses, support entrepreneurship opportunities, tourism development, renewable energy, and internet connectivity (GoC FedNor 2022b).

No additional information on the economic activities of Apitipi Anicinapek Nation was found through the review of publicly available information or through engagement with Canada Nickel.

25.2.5 Exercised or Practiced Indigenous and Treaty Rights

25.2.5.1 Customs and Protocols

The practice and perpetuation of Indigenous customs and protocols are considered core components of a Nation's cultural continuity and wellbeing (Kirmayer 1994; Lewis et al. 2021). As shared with the Agency through engagement on the Project, Apitipi Anicinapek Nation emphasized the importance of maintaining and protecting its customs, protocols, culture, traditions, and land uses which include (AAN 2023b, 2024a, b; IAAC 2023d):

- Cultural and spiritual beliefs
- Transmission of traditional knowledge, lifestyle, and practices to children
- Culturally and historically significant sites and sacred places such as Lake Abitibi, archaeological, heritage, burials and cemeteries, and significant landforms
- Habitation sites such as cabins and overnight campsites
- Hunting, trapping, fishing, and plant harvesting areas
- Trails and travel routes that provide access to important places within Apitipi Anicinapek Traditional Territory

Apitipi Anicinapek Nation's Cultural Department (AAN-CD) provides community members a place to learn and engage in the Nation's original ways of knowing and being. The goal of the AAN-CD is the preservation of Apitipi Anicinapek Nation culture in recognition of the history of its traditional roots by reclaiming the Nation's rightful responsibilities to the land and to enhance the quality of traditional and cultural learning in the community for all its members, and to make sure that all traditional roles and responsibilities are embraced in the learning process of gender equality (AAN 2023a). The mandate of the AAN-CD is to:

- Provide cultural support at the community level
- Support traditional land-based activities and programming
- Revitalize language, teachings, and traditional parenting program
- Support all ceremonies on an ongoing basis
- Engage all ages in the revitalization delivery process
- Provide cultural activities and programming at the community level
- Support the needs of historical influence
- Provide cultural support for school age children and youth
- Utilize Elder's Knowledge and Knowledge Keepers in the delivery process
- Schedule land base approach, planning of each Harvest season
- Foster and preserving rites of passage

During the early engagement phase for the Project, Apitipi Anicinapek Nation expressed concern to the Agency regarding the following potential effects to its cultural continuity (AAN 2022, 2023b, c, 2024a, b; IAAC 2023d):

- The Project's contribution to climate change.
- Effects on the rights and interests of Apitipi Anicinapek Nation.
- Lack of trust in Canada Nickel to engage and respect the values of Apitipi Anicinapek Nation.

Apitipi Anicinapek Nation indicated to the Agency during engagement on the Project that potential effects to current and future use of lands and resources could arise from construction of the rail line, transmission line, and highway relocation; an increase in temporary workers; and perceived and real changes to the visual landscape, air quality, noise and vibrations, and contamination (IAAC 2023d). These Project activities could impact access to harvesting, traplines and hunting camps, wildlife corridors, breeding grounds, and overwintering sites, impact the experience of being on the water, water quality and/or quantity, fish and fishing and impact harvesting and gathering of medicines, plants, and mushrooms (IAAC 2023d).

Canada Nickel's responses and proposed mitigation measures for the concerns and recommendations made by Apitipi Anicinapek Nation are found in Attachment 25.1.

25.2.5.2 Hunting and Trapping

As shared with the Agency through engagement on the Project, Apitipi Anicinapek Nation stated that maintaining and protecting the current use of lands and resources for traditional purposes, which includes lands used for hunting and trapping, and its members abilities to exercise their rights to hunt and trap as one of the Nation's core values (AAN 2023b, 2024a).

Apitipi Anicinapek Nation previously identified that the Nation has the right to maintain and protect wildlife, including but not limited to moose, black bear, beaver, marten, rabbit, mink, muskrat, fox, and lynx (Wahgoshig First Nation, Odonaterra Inc. and Shared Value Solutions 2021; AAN 2024a, b). As shared with the Agency through engagement on the Project, Apitipi Anicinapek Nation has also identified the following species of cultural importance: fisher, grey fox, muskrat, squirrel, otter, weasel, wolf, coyote, wolverine, cougar, boreal caribou, deer, white-tailed deer, geese, eagle (bald eagle), duck, grouse/partridge, crane, snowy owl, and osprey (AAN 2023b, 2024a, b; IAAC 2023d).

Apitipi Anicinapek Nation reported that the Project is located on a trapline formerly held by the father of an Elder member of the Nation (AAN 2024a). The trapline was held by the family historically for many generations (predating the establishment of the Ministry of Natural Resources [MNR] traplines); however, the trapline is no longer held by Nation members due to the privatization of lands in this area (AAN 2024a).

Apitipi Anicinapek Nation identified key hunting and trapping/snaring areas along Highway 655, at Boundary Lake, Kirkland Lake, Ghost River, Smooth Rock, along backroads near Cochrane and Timmins, and small lakes, ponds and wetlands surrounding the PA (AAN 2024a). Indigenous Ecological Knowledge (IEK) areas included mammal and bird habitats, and migration routes identified by Apitipi Anicinapek Nation members. Apitipi Anicinapek Nation explained that there is a strong community around hunting and trapping, and that these sites are important for the Nation's continued exercise of their Treaty rights (AAN 2024a).

Apitipi Anicinapek Nation identified hunting and trapping features that intersect the PA along Highway 655 (AAN 2024a). Apitipi Anicinapek Nation also identified well as trapping and snaring areas, change areas and hunting areas within the Indigenous Interests RSA, including areas for moose, partridge, American marten, fox, rabbit, lynx, river otter, squirrel and fisher (AAN 2024a).

Apitipi Anicinapek Nation identified wildlife habitat within the PA as an Areas of Ecological Significance for the community (AAN 2024a).

Additional mapped wildlife habitats and one migration route were identified by Apitipi Anicinapek Nation as Areas of Ecological Significance at locations 10 km or more from the PA (i.e., within the Indigenous Interests RSA), including habitats for snowy owl, moose, black bear, goose, duck, timber wolf, rabbit, beaver, muskrat, fox, partridge, coyote, eagle and osprey (AAN 2024a).

The Kesagami Caribou range intersects the PA, Indigenous Interests LSA, and RSA and was reported by Apitipi Anicinapek Nation to be an important hunting and trapping area (IAAC 2023d).

As shared with the Agency through engagement on the Project, Apitipi Anicinapek Nation expressed concern regarding the following potential effects to hunting and trapping, wildlife and wildlife habitat (AAN 2023b, 2024a, b; IAAC 2023d, 2024):

- Changes to or loss of access to the land and loss of the right to harvest
- Effects to terrestrial wildlife species from Project activities and increased hunting, including declining populations and habitat loss
- Effects on the ecological composition of the soil from project activities that would impact both plants and wildlife
- Effects to moose habitat, including calving sites, aquatic feeding areas, and wintering grounds
- Effects to boreal caribou, its critical habitat, and the Kesagami caribou range
- Contamination and disease observed in wildlife, particularly in moose
- Loss of quality in harvested meat from environmental contaminants
- Increased risk of human and wildlife interactions, including roadway collisions
- Loss of pristine landscapes and the displacement and poisoning of wildlife, which threaten traditional practices and the protection of the land for future generations

Canada Nickel's responses and proposed mitigation measures for the concerns and recommendations made by Apitipi Anicinapek Nation are found in Attachment 25.1.

25.2.5.3 Fishing and Water

Apitipi Anicinapek Nation stated that maintaining and protecting the current use of lands and resources for traditional purposes is one of its core values (AAN 2023b, 2024a, b). This includes maintaining and protecting waters used for fishing and the ability to exercise rights to fish through continued access to travel to culturally important fishing areas (AAN 2023b, 2024a, b).

Lake Abitibi, the Abitibi River and the Mattagami River were reported by Apitipi Anicinapek Nation to be waterbodies/waterways that are important for the Nation's rights, interests, culture and way of life (IAAC 2023d; AAN 2024a). The Mattagami River is approximately 4 km west of the PA and is located within the Indigenous Interests LSA. The Abitibi River is approximately 37 km northeast of the PA, and a sacred site was also identified on Abitibi Lake, within the Indigenous Interests RSA.

Smooth Rock Falls, located within the Indigenous Interests RSA, was reported to be an important water source by Apitipi Anicinapek Nation (IAAC 2023d; AAN 2024a).

Apitipi Anicinapek Nation previously indicated that it has the right and interest to maintain and protect fish, which includes the following species of importance: perch, catfish, whitefish, splake, sturgeon, northern pike/jackfish, walleye, speckled trout, rainbow trout, lake trout, muskie and smelts (Wahgoshig First Nation, Odonaterra Inc. and Shared Value Solutions 2021; AAN 2024a, b). In addition to these species, Apitipi Anicinapek Nation has also identified the following species of cultural importance: bait fish, sauger,

sea trout, bass (large and smallmouth), mooneye, sheepshead, goldeye, brook trout, burbot, lake sturgeon, pickerel and lake whitefish (IAAC 2023d; AAN 2024a).

West Buskegau River and the North Driftwood River were identified as fish habitat (general), and Jocko Creek was identified as sturgeon habitat by Apitipi Anicinapek Nation (IAAC 2023d). These three waterbodies intersect the PA. Jocko Creek and West Buskegau River are located within the Indigenous Interests LSA, and North Driftwood River is within the Indigenous Interests LSA and RSA.

Apitipi Anicinapek Nation shared the locations of additional fishing areas and Areas of Ecological Significance, including change areas, fish spawning areas, fish habitats and spring water sources. Two of these fishing areas were located in the Indigenous Interests LSA (AAN 2024a). Apitipi Anicinapek Nation shared that fishing is an important community activity that is tied to storytelling, cultural history and the transfer of intergenerational knowledge to youth (AAN 2024a).

Apitipi Anicinapek Nation identified water and fishing features within the Indigenous Interests LSA and RSA, including the Mattagami River, the Buskegau River, Little Goose Lake, the Frederick House River, Dunn's Lake, and in the area of Highways 11 and 655 (AAN 2024a).

Additional fish habitats and spring water sites were identified by Apitipi Anicinapek Nation as Areas of Ecological Significance, including fish spawning and sturgeon habitat, within the Indigenous Interests RSA (AAN 2024a).

Apitipi Anicinapek Nation expressed concern regarding the following potential effects to water, fishing, fish and fish habitat (IAAC 2023d, 2024; AAN 2024a, b):

- Habitat loss and overprinting of tributaries of the North Driftwood and West Buskegau Rivers
- Changes to water quality and quantity due to the overprinting of tributaries to the North Driftwood River, West Buskegau River, which feed into the Abitibi River, and Jocko Creek
- Location of the tailings management facility near the headwaters of the North Driftwood River and West Buskegau River, which feed into the Abitibi River
- Effects to water quality and quantity, including contamination from discharge, runoff, or seepage from water-crossings, waste rock stockpiles, ore stockpiles, overburden stockpiles, and the tailings management facility
- Effects to water quantity and associated risks of mercury mobilization.
- Loss of natural waterbodies
- Changes to groundwater-surface water interactions
- Effects related to blasting in or near fish and fish habitat and spawning sites and impacts related to fish relocation
- Effects to lake sturgeon due to effluent
- Discharge in the Mattagami River and noise and vibrations from blasting

- Impacts to human health, including actual and perceived risks at key receptors due to changes recreational and drinking water quality
- Effects to potable water sources and water intake at Smooth Rock Falls
- The number of hydro dams in its Traditional Territory, and the potential impacts of flooding and water flow and fluctuation
- Eutrophication of water bodies and algal blooms
- Methylmercury and its accumulation and dispersion into waterbodies
- Trophic level interactions between species
- The potential for sulphate to leach into groundwater and the related potential effects on Nation members
- Contamination and disease observed in wildlife, particularly in fish

Canada Nickel's responses and proposed mitigation measures for the concerns and recommendations made by Apitipi Anicinapek Nation are found in Attachment 25.1.

25.2.5.4 Gathering

As shared with the Agency through engagement on the Project, Apitipi Anicinapek Nation stated that maintaining and protecting the current use of lands and resources for traditional purposes, which includes lands used for plant and medicine harvesting and ability to exercise rights to harvest plants (AAN 2023b, 2024a, b).

Apitipi Anicinapek Nation previously identified that the Nation has the right to maintain and protect plants (for eating, medicines, ceremony, building materials, and firewood), which includes the following species of importance: blueberries, raspberries, strawberries, chokeberries, large and small cranberries, hazelnut, and tamarack (Wahgoshig First Nation, Odonaterra Inc. and Shared Value Solutions 2021; AAN 2024a). In addition to these species, Apitipi Anicinapek Nation has also identified the following species of cultural importance: moss, fungi, reindeer lichen, gooseberries, Labrador tea, and mushrooms (IAAC 2023d; AAN 2024a).

Apitipi Anicinapek Nation provided a map that identified gathering areas and Areas of Ecological Significance, including change areas for plants and plant habitats, at locations outside of the Indigenous Interests LSA and RSA. Apitipi Anicinapek Nation members explained that plants and berries were consumed as wild foods, used for arts and crafts, and were especially important in traditional medicines (AAN 2024a).

Apitipi Anicinapek Nation expressed concern regarding the following potential effects to vegetation and harvesting (IAAC 2023d, 2024; AAN 2024a):

- Effects to muskeg and unevaluated wetlands in the PA
- Impacts to natural carbon sequestration, and from forest fragmentation and contamination of vegetation from fugitive dust, metals, and nitrogen from explosives

- Invasive plant management and revegetation methodology, and residual effects
- Loss of ecology in the soil to support the growth of vegetation from project development and activities
- Habitat loss for harvested plants, and related impacts on wildlife populations.

Canada Nickel's responses and proposed mitigation measures for the concerns and recommendations made by Apitipi Anicinapek Nation are found in Attachment 25.1.

25.2.5.5 Cultural Heritage

Apitipi Anicinapek Nation reported the importance of maintaining and protecting its culture and traditions, which include access to and use of culturally and historically important sites and sacred places within its Traditional Territory (e.g., Lake Abitibi; archaeological and heritage sites; burials and cemetery sites; important landforms) (AAN 2022, 2023b, c; IAAC 2023d). Apitipi Anicinapek Nation members added that despite changes to the Nation's Traditional Territory due to mining development, maintaining a connection to the land remains an important aspect of life for many community members (AAN 2024b).

During the early engagement phase for the Project, Apitipi Anicinapek Nation provided a preliminary guide to its values, including (AAN 2023b):

- Maintaining and protecting the current use of lands and resources for traditional purposes, which includes access throughout Apitipi Anicinapek Nation's Traditional Territory, and occupancy/habitation sites such as cabins, overnight use areas /campsites
- Maintaining and protecting physical and cultural heritage, which includes cultural continuity, ceremonial sites and activities, and historically significant cultural sites
- Apitipi Anicinapek Nation previously reported that the Nation has a sacred duty to care for the lands and resources of its Traditional Territory as good stewards of the environment (WFN 2020)

Apitipi Anicinapek Nation indicated to the Agency through Project engagement that cultural heritage includes sacred, ceremonial, or culturally important places (e.g., waterbodies including the Mattagami River and Abitibi River), plants (e.g., cedar, sage, spruce, sweetgrass), animals (e.g., bald eagles, moose, spirit moose), objects, beings or things and teaching areas used to transfer knowledge between generations; as well as sites occupied historically (AAN 2022, 2023b, c; IAAC 2023d).

Apitipi Anicinapek Nation reported that several cultural sites are located within its Traditional Territory, however, many of these sites were not identified with an exact location (AAN 2024a). Apitipi Anicinapek Nation members described the importance and use of these areas, often noting how they connect them to their ancestors who used the land before them (AAN 2024a).

Apitipi Anicinapek Nation identified two sites within the Indigenous Interests LSA (AAN 2024a). These include a sacred site at Lake Abitibi and a cultural site along the Mattagami River. The Nation also identified one cultural site within the Indigenous Interests RSA, located along the Abitibi River. Apitipi Anicinapek Nation reported that these sites are important for knowledge transmission (AAN 2024a).

Apitipi Anicinapek Nation also reported that the Project is located on a trapline formerly held by the father of an Elder member of the Nation (AAN 2024a). The trapline was held by the family historically for many generations; however, the trapline is no longer held by Nation members (AAN 2024a).

As shared with the Agency through engagement on the Project, Apitipi Anicinapek Nation expressed concerns regarding potential effects to physical and cultural heritage resources and structures, sites, or things of historical, archaeological, paleontological or architectural significance in or near the PA (AAN 2022, 2023b, 2024a; IAAC 2023d).

A Cultural Heritage Screening Report (CHSR) (Appendix B.10) and a Stage 1 Archaeological Assessment (Stage 1 AA) (Appendix B.11) was conducted for the baseline investigations prepared for the Impact Statement. The CHSR identified no potential non-Indigenous built heritage resources or cultural heritage landscapes within the PA and recommended that, unless the PA changes, no further cultural heritage assessment was required (Appendix B.10 CHSR). However, a Stage 1 AA was required and, through engagement with Indigenous Nations, Indigenous Knowledge informed the Stage 1 AA, and interested Indigenous Nations were provided with draft copies of the Stage 1 AA report for review and comment (Appendix B.11 Stage 1 AA). The Stage 1 AA indicated that approximately 416 ha (2.5%) of the PA has general archaeological potential due the presence of elevated and well drained landforms, natural resources (e.g., medicinal plants) and proximity to primary water sources of cultural importance to Indigenous Nations (e.g., Mattagami, North Driftwood and West Buskegau rivers) (Appendix B.11 Stage 1 AA). Remaining areas of the PA were determined to have no or low potential due to recent extensive and deep land alterations (461 ha; 2.7%); the negative results of previous archaeological investigations (175 ha; 1.0%); heavily saturated and/or permanently wet areas (11,671 ha; 69.3%); and areas at > 50 m distance from modern water sources and/or glacial shorelines (4,117 ha; 24.4%) (Appendix B.11 Stage 1 AA). On November 14, 2024, the Ontario Ministry of Citizenship and Multiculturalism (MCM) confirmed that the Stage 1 AA was completed in accordance with the Standards and Guidelines for Consultant Archaeologists (Ontario Ministry of Tourism and Culture 2011). The Stage 1 AA report (Appendix B.11) has been entered into the Ontario Public Register of Archaeological Reports.

Areas where a Stage 2 AA is required are shown on Figure 25.3 (Appendix B.11). Previously assessed areas and areas of no or low archaeological potential (i.e., where no further assessment is required) are also shown on Figure 25.3 (Appendix B.11).

The Stage 1 AA report concluded that those areas (416 ha; 2.5%) of the PA with general archaeological potential warrant Stage 2 archaeological assessment (Stage 2 AA) prior to ground disturbance (Appendix B.11 Stage 1 AA; Figure 25.3). These areas include:

- 50 m along both sides of the North Driftwood River, West Buskegau River, Jocko Creek, and Kidd Creek and associated permanent tributaries
- Areas within 50 m of the lakeshores of Martin Lake, Gerry Lake, Jack Lake, Sutherland Lake, Mel Lake, Sed Lake, Boundary Lake and Feldman Lake
- The esker in the central portion of the PA and an area of well-drained and elevated topography located northeast of the Kidd Creek Mine

25.3 Project Interactions

Table 25.3 identifies, for each potential Project effect, the physical activities that might interact with the Nation's rights and interests and result in the identified effect. These interactions are indicated by a check mark or a dash and are discussed in Section 25.4, in the context of effects pathways, standard and Project-specific mitigation/enhancement, and residual effects.

Table 25.3 Project Interactions with Indigenous Interests – Apitipi Anicinapek Nation

Project Activities and Physical Works	Potential Project Effects		
	Change to Apitipi Anicinapek Nation Indigenous and Treaty Rights	Change in Apitipi Anicinapek Nation Physical and Cultural Heritage	Change to Governance, Health, Social and Economic Conditions of Apitipi Anicinapek Nation
Construction			
Mobilization of construction equipment and materials on site.	✓	–	✓
Vegetation clearing, including the removal and disposal of trees, brush, shrubs, and other foliage.	✓	✓	✓
Stripping, including the removal of topsoil and other organic materials, as well as storing of some materials for use in reclamation.	✓	✓	✓
Grading of overburden to be used as fill.	–	✓	✓
Handling and use of explosives, including blasting.	✓	✓	✓
Excavating and pre-stripping of mine rock from Open Pit and surrounding area.	✓	✓	✓
Development of the Impoundment Facility for storage of rock, clay, sand, and till.	✓	✓	✓
Preparation of construction surfaces, including hauling reclaimed graded material and crushed mine rock to construction locations.	✓	✓	✓
Construction of water management systems to collect, manage, treat and discharge contact water from mine components to the receiving waterbodies via collection ponds, ditches, and water treatment plants.	✓	✓	✓
Construction of minor water diversions around perimeter of the mine site to collect and divert flows.	✓	✓	✓
Dewatering of natural water bodies within the PA.	✓	✓	✓

Project Activities and Physical Works	Potential Project Effects		
	Change to Apitipi Anicinapek Nation Indigenous and Treaty Rights	Change in Apitipi Anicinapek Nation Physical and Cultural Heritage	Change to Governance, Health, Social and Economic Conditions of Apitipi Anicinapek Nation
Waste management, including collection and temporary storage.	✓	✓	✓
Construction of mine infrastructure, including crusher facilities, process plant and TMF, as well as the potable water well, and ancillary infrastructure (e.g., offices, workshop, fuel farm, magazine storage and explosives pad).	✓	✓	✓
Construction of internal haul roads and internal access roads, including water crossings.	✓	✓	✓
Construction of power supply and distribution systems.	✓	✓	✓
Construction of temporary Highway 655 bypass and overpass.	✓	✓	✓
Construction of the rail spur.	✓	✓	✓
Vehicle operation within the PA.	✓	✓	✓
Employment and expenditures ¹ .	✓	–	✓
Operation (Mining and Processing)			
Construction of Project infrastructure, including the expansion of ore processing components.	✓	✓	✓
Relocation and decommissioning of Highway 655 and associated infrastructure.	✓	✓	✓
Relocation of 500 kV transmission line.	✓	✓	✓
Construction of the North Driftwood Diversion Channel.	✓	✓	✓
Handling and use of explosives including blasting.	✓	✓	✓
Ore extraction in the Main Zone and East Zone of the Open Pit, including drilling, loading and hauling of mine rock from the pits.	✓	✓	✓
Maintenance and management of mine rock stockpiles, overburden, and TMF.	✓	✓	✓
Ore processing, including conveyor, crushing and processing activities with and between the stockpiles, crusher facilities and process plant.	✓	✓	✓

Project Activities and Physical Works	Potential Project Effects		
	Change to Apitipi Anicinapek Nation Indigenous and Treaty Rights	Change in Apitipi Anicinapek Nation Physical and Cultural Heritage	Change to Governance, Health, Social and Economic Conditions of Apitipi Anicinapek Nation
Operation of water management systems, including the collection, management, treatment and discharge of contact water from mine components to the receiving waterbodies via collection ponds, ditches and water treatment plants.	✓	✓	✓
Transportation of Ore via the rail spur line.	✓	–	✓
Waste management, including collection and temporary storage.	✓	✓	✓
Vehicle operation within the PA.	✓	✓	✓
Progressive reclamation of disturbed areas.	✓	✓	✓
Employment and expenditures ¹ .	✓	–	✓
Decommissioning and Closure			
Pit flooding through the creation of channels from the collection ponds towards the Open Pit.	✓	✓	✓
Water management, including groundwater and surface water.	✓	✓	✓
Decommissioning, dismantling and/or disposal of buildings and mine infrastructure.	✓	✓	✓
Removal of power lines and electrical equipment.	✓	–	✓
Decommissioning of potable water and sewage systems.	✓	–	✓
Vehicle operation within the PA.	✓	✓	✓
Reclamation, including the placement of overburden, seeding and re-grading.	✓	✓	✓
Monitoring and maintenance.	✓	✓	✓
Employment and expenditures ¹ .	✓	–	✓
Notes: ✓ = Potential interaction – = No interaction ¹ Project employment and expenditures are generated by most Project activities and are the main drivers of many potential socio-economic effects. Rather than acknowledging this by placing a checkmark against each of these activities, 'employment and expenditures' is listed as a separate item under each phase of the Project.			

25.4 Assessment of Residual Effects

The assessment of residual effects is described for each of the identified Indigenous interests in Section 25.1.5. This evaluation focuses on the effect pathways listed in Section 25.1.5 and characterizes adverse residual effects according to the approach described in Section 25.1.7. A summary of the assessment of the residual effects of the Project is provided in Section 25.4.4

Residual effects on aspects of Apitipi Anicinapek Nation's interests identified for assessment have been conservatively overestimated with consideration for the interconnectedness of the effect pathways that inform the Indigenous interests. The analysis in Section 25.4 incorporates the findings of relevant VCs; however, potential effects may not fully align with effects on the Indigenous interests. As a result, the characterization of residual effects on the Indigenous interests are generally ranked higher than the residual effects characterized for related VCs (e.g., magnitude, timing). This is considered when evaluating the need for additional mitigation and enhancement measures, review processes, or monitoring initiatives that are specific to Apitipi Anicinapek Nation's interests.

25.4.1 Change to Apitipi Anicinapek Nation's Indigenous and Treaty Rights

This section provides the assessment of potential Project effects on Apitipi Anicinapek Nation's Indigenous and Treaty Rights.

25.4.1.1 Project Pathways

All phases of the Project (construction, operation, decommissioning and closure) have the potential to affect Apitipi Anicinapek Nation's Indigenous and Treaty Rights. Changes to Apitipi Anicinapek Nation's Indigenous and Treaty Rights could result through the pathways identified in Table 25.1 in Section 25.1.5

The conclusions in this section are informed by the results of engagement with Apitipi Anicinapek Nation, the literature review, and related biophysical and socio-economic VC assessments presented in the Impact Statement.

25.4.1.2 Mitigation and Enhancement Measures

Mitigation measures were selected based on the considerations described in Section 25.1.8 and are intended to be implemented in combination with Project design considerations and measures to mitigate and enhance potential effects of the Project on environmental resources and conditions that are connected to Apitipi Anicinapek Nation's Indigenous and Treaty Rights. Attachment 25.1 provides Canada Nickel's responses and proposed mitigation measures for the concerns and recommendations made by Apitipi Anicinapek Nation.¹⁶

¹⁶ A complete listing of measures can be found in Appendix E (Summary of Project Commitments) of the Impact Statement.

In conjunction with the measures described in Appendix E (Summary of Project Commitments) of the Impact Statement and Attachment 25.1, Canada Nickel will develop and implement a Project-specific construction environmental protection plan (CEPP) that describes the mitigation and enhancement measures tied to Project-related activities and physical works associated with construction. The CEPP will be incorporated into appropriate construction-related contracts.

Environmental Management plans are also proposed to be prepared to address important management issues, regulatory requirements, and incorporate mitigation measures and commitments identified in the Impact Statement related to the Project generally, and to VCs. The plans will identify risks to VCs, and outline measures and means planned to protect the environment. The plans will describe the management actions, roles and responsibilities, evaluation mechanisms, updating requirements, and reporting schedules. The Environmental Management Plans that will be prepared prior to the start of Project construction and/or operations, are described in Section 25.4.1.3, where applicable.¹⁷

Canada Nickel will continue to engage Apitipi Anicinapek Nation to understand and mitigate the Project's impacts on its Indigenous interests, explore opportunities to enhance Project benefits, and consider its recommendations and input on Project decisions, including the development of management plans and offsetting (e.g., CEPP, Fisheries Offsetting Plan, Site-Wide Water Management Plan; Closure Plan). Through this ongoing collaboration, Canada Nickel aims to foster a positive long-term relationship with Apitipi Anicinapek Nation throughout the life of the Project.

25.4.1.3 Project Residual Effect

The analysis in this section incorporates the findings of the VC assessments found in the Impact Statement that are relevant to Apitipi Anicinapek Nation's Indigenous and Treaty Rights.¹⁸

Apitipi Anicinapek Nation identified culturally important waterbodies (e.g., rivers, wetlands), travel routes, animal, plant, and fish species, and associated activities that occur within the PA, MMB and Indigenous Interests LSA (Section 25.2.5; AAN 2024a). Apitipi Anicinapek Nation reported that one of its core values involves maintaining and protecting the current use of lands, waters and resources for traditional purposes, including for travel and cultural continuity (AAN 2023b, 2024a).

A summary of Project activities during the Construction, Operation, Decommissioning and Closure Phases is provided in Section 25.1.6.2.¹⁹ Site preparation and clearing within the PA will result in a direct loss of 11,785 ha of land area, of which approximately 11,334 ha is patented (private) land, and 450 ha is assumed to be provincial Crown land.²⁰ As described in Section 25.1.6, Canada Nickel will establish a

¹⁷ See Table 34.2 Chapter 34 Follow-up Programs and Adaptive Management.

¹⁸ These include Chapter 12 Atmospheric Environment, Chapter 13 Acoustic Environment, Chapter 14 Groundwater, Chapter 15 Surface Water, Chapter 16 Vegetation, Riparian and Wetland Environments, Chapter 17 Fish and Fish Habitat, Chapter 18 Bird and Bird Habitat, Chapter 19 Wildlife and Wildlife Habitat, Chapter 20 Climate Change, Chapter 21 Health, 22 Social Conditions, and Chapter 23 Economic Conditions.

¹⁹ Project phases and activities are also described in Chapter 3.

²⁰ Information used for geographic information systems (GIS) analysis of Crown land was the Teranet parcel polygons as purchased from First Base Solutions Inc. For this assessment, where no Property Identification Numbers (PIN) and associated parcel fabric are recorded within the PA and MMB, these lands are assumed to be provincial

boundary around the periphery of the PA which is referred to as the MMB. The MMB encompasses approximately 19,312 ha of land additional to that described above for the PA, of which approximately 18,436 ha is patented (private) land, and 876 ha is assumed to be provincial Crown land. Combined, the total area of the PA and MMB equal 31,097 ha, with 1,326 ha of provincial Crown lands.

The total area of the PA and MMB represent approximately 0.05% of the Treaty 9 land base. Areas assumed to be Crown lands within the PA and MMB represent approximately 0.002% of the Treaty 9 land base. Crown lands in the PA and MMB are not contiguous and are largely surrounded by patented (private) lands that may constrain access to the Crown lands. It is currently unknown if there are existing arrangements that support access to these Crown lands through the patented (private) lands. For this assessment, it is assumed that the provincial Crown lands located adjacent to Highway 655 and within the PA and the MMB may be accessible for the exercise of Indigenous rights.

Access to the PA and MMB will be restricted and/or controlled during all Project phases. Apitipi Anicinapek Nation's access routes and ability to travel to or through preferred use areas/sites of interest that overlap with accessible Crown lands within the PA and/or the MMB will be altered through these access restrictions. However, site access is a key element considered in the Impact Benefit Agreement under negotiation with Apitipi Anicinapek Nation and will include the conditions for members of Apitipi Anicinapek Nation to access select areas of the PA and MMB for the exercise of Indigenous and Treaty Rights, acknowledging that, for safety and operational reasons, it may be necessary for Canada Nickel to restrict access to certain lands and/or activities within the PA and MMB. For example, it is anticipated that members of Apitipi Anicinapek Nation could still pass through the MMB on snowmobile trails, rivers, or other routes adjacent to the PA, but time spent within the MMB would be limited and no overnight stays would be possible. Canada Nickel will provide in-kind support to local snowmobile club(s) for the loss of a snowmobile trail and associated warming hut in establishing a snowmobile trail bypass around the PA. The presence of the new transmission line through portions of the PA, along with the joining at the north and south to the existing corridor, may facilitate access along the new Right-of-Way (ROW) corridor for Apitipi Anicinapek Nation exercise of Indigenous and Treaty Rights. However, the new ROW corridor may also be viewed as a hinderance by creating undesired access to harvesting areas by non-Apitipi Anicinapek Nation members.

Canada Nickel will increase flexibility in work schedules to enable the continued participation of Indigenous employees in traditional and cultural activities, however, Project workers will be prohibited from bringing hunting and fishing gear while working at the Project to limit competition for wildlife and fish species of value to Apitipi Anicinapek Nation. Non-Indigenous workers would also need to obtain the necessary licences from the MNR to be able to hunt wildlife species in this area and there are a limited number of licenses issued to hunt certain species at certain times of the year. However, potential for disruptions to Apitipi Anicinapek Nation's hunting, fishing and other harvesting activities associated with the Project workforce are predicted within portions of the PA, the MMB, and Indigenous Interests LSA when Project workers are on leave or otherwise off-duty. A community feedback tool or process will be

Crown land. Through engagement with the Ministry of Natural Resources (MNR) in Ontario, this assumption was determined to be acceptable for the purpose of this assessment. For this assessment, it is assumed that the identified provincial Crown lands are currently accessible within the PA and the MMB for the exercise of Indigenous and Treaty Rights.

implemented to receive and address community concerns and complaints with the aim of reducing adverse effects of the Project on Indigenous subgroups related to harvesting pressure or other matters related to the Project workforce. Additional information regarding disproportionately distributed residual effects on Indigenous subgroups is provided in Section 25.4.4.3.

Overall, in consideration of the agreement under negotiation with Apitipi Anicinapek Nation, including provisions for site access (i.e., PA, MMB), the Project is not expected to create a change or disruption that widely reduces or restricts Apitipi Anicinapek Nation's current use of lands and resources for traditional purposes, including the Nation's ability to access culturally important sites or features (e.g., hunting sites, fishing sites) within the Indigenous Interest LSA or its broader Traditional Territory.

Indigenous receptors used for air quality and health modelling included generalized locations identified by Indigenous Nations for overnight use and/or for other use (e.g., harvesting country foods/ hunting, trapping, fishing, gathering; water use, including canoeing; traditional, ceremonial or spiritual purposes).²¹ Changes to air quality are predicted within the PA and Atmospheric Environment LSA during Project construction and operation. Air quality emissions during Project decommissioning and closure were not explicitly modelled because active closure emissions are expected to be less than construction emissions. Therefore, the assessment of the construction-related scenario was considered to implicitly address emissions during the active closure phase as well. In terms of inhalation, Project-related contaminants in air are not likely to be greater than the applicable exposure limits and toxicity reference values at locations where people are expected to be present for extended periods of time (including overnight stays or beyond). For Chrysotile asbestos inhalation specifically, it is predicted that potential inhalation throughout the Project lifetime will not result in unacceptable cancer risk to people spending time in the Indigenous Interests LSA. However, given that some identified Contaminants of Potential Concern (CoPCs) are non-threshold contaminants for which any increase in exposure could result in increased health effects (e.g., PM_{2.5}), reasonable mitigations will be undertaken to minimize releases of CoPCs to the environment and an Air Quality Management Plan (AQMP) will be developed for Project construction and operations. The AQMP will specify the mitigation measures for the management and reduction of air emissions during Project construction and operations and the proposed ambient air quality monitoring program.

In terms of multimedia exposures (including consumption of country food), Project-related health risks for arsenic were identified for the North Driftwood River and West Buskegau River watersheds, while Project-related health risks are negligible for the Jocko Creek watershed. For arsenic, the greatest contribution to health risk estimates is from exposures associated with modelled changes in surface water (i.e., fish and potable water consumption). Even though the health risk estimates for consumption of fish and potable water are above targets, modelled concentrations are less than guidelines that are protective of health (Health Canada 2022, 2024). As it relates to surface water quality, follow-up and monitoring measures will be implemented at key Project locations to meet regulatory requirements related to surface water. The focus on monitoring activities will be at the final discharge point locations, as well as upstream and downstream locations, and this will include monitoring of arsenic in surface water and fish in each watershed.

²¹ See Appendix C.7 Human Health and Ecological Risk Assessment.

For the North Driftwood River channel realignment, changes in mercury concentration in angling fish was calculated to be low (approximately 4%) and are not expected to increase potential exposures to methyl mercury through fish consumption for people who consume fish within the Indigenous Interests LSA (including members of Apitipi Anicinapek Nation). While Project-related activities are not expected to result in increased concentrations of mercury in the environment, the presence of mercury in fish is a regional concern as mercury concentrations in angling fish tissue are greater than the Health Canada maximum limit for retail fish and there are fish consumption advisories in the Indigenous Interest LSA (MECP 2021a, 2021b).

Lighting sources from Project construction and operation will include stationary and mobile lighting sources that may cause some increased lighting outside the PA. During construction and operations, with mitigation, the levels of light trespass and glare from mobile artificial lighting units are not expected to exceed guidelines at the receptor locations within the Atmospheric Environment LSA (International Commission on Illumination 2017). There are few light sensitive receptors in the Atmospheric Environment LSA, and they are all well removed from the Project with intervening forested areas that will obstruct Project lighting. Thus, no substantive adverse impacts from Project light trespass are expected to influence the quality of experience or required conditions that are connected to the exercise of Apitipi Anicinapek Nation's Indigenous and Treaty Rights within the Indigenous Interests LSA. Following decommissioning and closure, ambient lighting is expected to return to baseline conditions once project lighting sources are removed from the area.

Changes to noise and vibration are predicted within the PA and Acoustic Environment LSA during all Project phases, however, the effects are not predicted to exceed federal or provincial criteria, including at the generalized receptor locations identified by Indigenous Nations as places of overnight use, and are predicted to be reversible as the increase in sound levels will end once the related activities cease (e.g., blasting; realignment of Highway 655; rail traffic). Although federal and provincial criteria for noise will be met, sensory disturbance (e.g., change in noise levels) is predicted within the Indigenous Interests LSA as noise generated through construction, operation, decommissioning and closure activities may influence the quality of experience or required conditions that are connected to the exercise of Apitipi Anicinapek Nation's Indigenous and Treaty Rights, and are likely to increase when harvesting or engaging in other cultural activities in proximity to the PA and modelled mine boundary.

The Project is expected to result in a net release of GHG emissions during the Project's lifetime, the magnitude of which is estimated to be 11,135 kilotonnes (kt) of carbon dioxide equivalent (CO₂e). However, the Project is also expected to result in a net increase in carbon sinks, and therefore carbon sequestration potential, during the Project's lifetime, the magnitude of which is estimated to be 46,678 kt CO₂e. While the change in release of GHG emissions and the change in carbon sinks (net increase) is expected to occur with irregular frequency (e.g., tied to operation schedules; operation of equipment and vehicles; periodic land clearing and blasting activities; reclamation activities) the resulting effects are expected to be long-term and lasting beyond the duration of the Project. This is because, the effects on climate change due to the release of GHG in the atmosphere and climate sink changes are by definition persistent and long-term. Similarly, with climate change effects by definition only being realized globally, the net release of GHG emissions and the net change in carbon sinks due to the Project are characterized as being global effects, extending beyond the Indigenous Interests RSA. The net release of

GHG emissions due to the Project is irreversible, since once GHGs are released to the lower atmosphere, there is currently no mechanism by which they can be mitigated. The net change in carbon sinks due to the Project is reversible, since carbon sinks may be added or removed at any point either during the Project lifetime or after, to the extent where no change in carbon sink may be detected when compared to prior to Project implementation.²²

Alteration of habitats and the current and future quality, quantity or distribution of country foods and other resources harvested by Apitipi Anicinapek Nation are predicted within the PA and Indigenous Interests LSA and are described separately below in relation to groundwater and surface water, and for plants, fish, birds and wildlife. Alteration to harvesting methods, timing or seasonality are not anticipated as the species present within the PA are also present within the Indigenous Interests LSA, the broader Treaty 9 land base, and Apitipi Anicinapek Nation's Traditional Territory. It is expected that Apitipi Anicinapek Nation will be able to continue its harvesting, hunting, trapping and fishing activities on accessible Crown lands and other areas where its member's currently exercise their Indigenous and Treaty Rights outside of the PA and within and beyond the MMB.

Changes in groundwater levels are predicted within the PA and the Groundwater LSA because of the planned Open Pit dewatering, diversion of the North Driftwood River, and operation of the Tailings Management Facility (TMF) during the construction and operation phases. Changes in surface water are also predicted within the PA and Surface Water LSA because of Open Pit dewatering, centralized mine water management, sequestration of water into tailings pore spaces and other mine water uses. Construction and/or operation activities resulting in dewatering and/or fluctuations in ground and surface water levels may alter habitat supporting harvested resources within the PA and these temporary effects are predicted to extend to waterbodies within the Indigenous Interests LSA (e.g., West Buskegau River, Gerry Lake, Martin Lake, Jocko Creek, North Driftwood River). During the operations phase, the North Driftwood watershed is predicted to experience a greater reduction in flow compared to baseline levels. However, no substantive Project-related reductions in surface water flow is predicted for Jocko Creek or the West Buskegau Watersheds for any Project phase.

During and after the decommissioning and passive closure phase, groundwater levels will slowly recover within the PA and Groundwater LSA as the Open Pit refills and groundwater returns to a steady state. Furthermore, mounding of the water table in the vicinity of the Tailings Management Facility and in the PA during operations and passive closure may result in a positive change to groundwater quantity. Seepage from the East and West Stockpiles, Tailings Management Facility and Impoundment Facility is not predicted to exceed the criteria established within the Metal and Diamond Mining Effluent Regulations for its impacts to groundwater quality (GOC 2024). However, Project-related seepage may exceed the Ontario Drinking Water Quality Standards, the Guidelines for Canadian Drinking Water Quality, the Provincial Water Quality Objectives and the Canadian Water Quality Guidelines for Protection of Freshwater Aquatic Life regarding nitrate, Hexavalent chromium, sodium, arsenic, copper and uranium, and aesthetic guidelines for chloride and manganese throughout the life of the Project (GovOnt 2002; GovOnt 1994; Health Canada 2024; MOEE 1994; CCME 2024). Residual effects on surface water quality are not predicted to be substantial as effluent will comply with regulatory requirement limits/guidelines at

²² See Appendix C.6 Greenhouse Gases Following the Strategic Assessment of Climate Change.

the Final Discharge Points and no watershed management targets will be contravened. Local water quality immediately downstream of some Final Discharge Points will experience an increase in Parameter of Potential Concerns above baseline levels (GOC 2024). However, these changes are expected to be contained within the boundaries of the Surface Water LSA and dissipate at the edge of the mixing zone. In addition, surface water quality may be adversely affected by erosion and sedimentation during construction through to the end of operations. A Site-Wide Water Management Plan (Appendix J) has been developed for the PA that incorporates standard management practices, including drainage control, excavation and open pit dewatering.

Plant species of cultural importance to Apitipi Anicinapek Nation are present in the Vegetation, Riparian and Wetland Environments LSA (e.g., hazelnut, blueberries, Labrador tea, tamarack) and are likely to be present in the PA (Section 25.2.5.4). Site preparation and clearing activities will result in a loss of abundance of plant species of cultural importance within the PA (if present) as well as indirect effects (e.g., dust; edge effects), that may change the species composition in the vicinity of the PA. No change in plant species richness in the Vegetation, Riparian and Wetland Environments LSA is expected as the identified species are common and widely distributed in the region and are expected to remain present and persist over time. No plant species at risk or plant species of conservation concern are documented in the PA or in the Vegetation, Riparian and Wetland Environments LSA, however riparian communities and wetlands were identified in these assessment areas and direct (loss) and indirect effects (changes in wind, light, and hydrology) are predicted for these features during the construction and operation phases. Overall, direct loss of plant species of Indigenous interest and riparian communities and wetland areas will be offset in part by reclamation and revegetation activities after the operations phase is complete, and through progressive reclamation where appropriate.

Some fish species of cultural importance to Apitipi Anicinapek Nation are present in the Fish and Fish Habitat LSA (e.g., northern pike, yellow perch, burbot, walleye) (Section 25.2.5.3). Direct loss of fish habitat will occur in the PA and changes to fish habitat within the Fish and Fish Habitat LSA are predicted due to the altering of stream flows during all phases of the Project. It is anticipated that this effect will be reversible, with flows returning close to baseline within the Fish and Fish Habitat LSA after the decommissioning and closure phase. Mitigation of potential effects on species of cultural importance such as sturgeon, walleye, pike and white sucker was accomplished in part during preliminary design and multiple accounts assessment by strategic reduction of the PA in the West Buskegau River and Jocko Creek watersheds, and through avoidance of effluent discharge to the Mattagami River. Changes in fish health, growth and survival for species of importance to Apitipi Anicinapek Nation are also expected to occur within the Fish and Fish Habitat LSA due to changes in water quality and possible reduction in aquatic invertebrate abundance. The effects on fish health, growth and survival are considered reversible, as effluent discharge will cease at the end of the Project and water quality is expected to return to conditions close to baseline after the decommissioning and closure phase. Both the loss of fish habitat in the PA and the potential reduction in productivity of downstream fish communities in the Fish and Fish Habitat LSA cannot be avoided and therefore will be addressed through the development and submission of a Fisheries Offset Plan to Fisheries and Oceans Canada (DFO) as part of the section 35(2)(b) *Fisheries Act* Authorization application. As described in Section 25.4.1.2, the Fisheries Offset Plan (Appendix M) has been developed in consultation with Indigenous Nations and others to form the basis for further discussions, refinement, and confirmation of proposed habitat offsetting measures.

Bird species of cultural importance to Apitipi Anicinapek Nation are present in the Bird and Bird Habitat LSA (e.g., snowy owl, geese, ducks) (Section 25.2.5.2). Direct loss of bird habitat will occur in the PA during the construction phase because of vegetation clearing, stripping in preparation for excavation and construction of mine infrastructure, water management, access and haul roads, power supply and distribution systems, construction of temporary Highway 655 by-pass and overpass and the rail spur. Indirect habitat loss will occur in the Bird and Bird Habitat LSA during the construction and operations phases due to sensory disturbance from noise and vibration from blasting, infrastructure construction and heavy equipment use, site lighting, increased traffic volumes, presence of workers and dust deposition. Changes are predicted to be both reversible (e.g., light and noise disturbance) and irreversible (e.g., loss of mature forest habitat). A change in mortality risk is predicted for birds during all Project phases (e.g., due to vegetation and clearing during construction; collisions with vehicle traffic or transmission lines during operation; edge effects), however the implementation of timing windows will greatly reduce the likelihood of mortality to birds during construction and the implementation of design features (e.g., contouring of stockpiles; bird nesting deterrents) reduce the likelihood of adverse interactions with bird species during the operation phase. Habitat for waterbirds and waterfowl is expected to increase following decommissioning and closure because aquatic habitats such as lakes and ponds will be established in the PA, which could be used for nesting and foraging.

Wildlife species of cultural importance to Apitipi Anicinapek Nation are present in the Wildlife and Wildlife Habitat LSA (e.g., moose, beaver, red fox, marten, Canada Lynx, Northern gray wolf) (Section 25.2.5.2). Changes to wildlife habitat are predicted within the PA and the Wildlife and Wildlife Habitat LSA. Direct loss of wildlife habitat will occur within the PA during construction (e.g., site clearing, stripping, grading, and excavation) but will be reversible through progressive reclamation which will be initiated in the operations phase to restore habitat lost within the PA by incorporating biodiversity-focused strategies. This process aims to create more suitable habitats for various wildlife species, including amphibians, reptiles, moose, bats, and boreal caribou, eventually resulting in a landscape that is more consistent with the natural habitats of the Wildlife and Wildlife Habitat LSA. Indirect effects such as changing vegetation and microclimate conditions are also predicted within the PA and adjacent areas within the Wildlife and Wildlife Habitat LSA and are considered reversible through the mechanisms described above. Wildlife habitat may be altered during the operation phase due to changes in hydrology and flood regime through the Open Pit dewatering, however progressive reclamation during the operations phase is predicted to have a positive change in habitat, allowing wildlife to return to the area. As the Project transitions to passive closure, wildlife habitat will continue to regenerate and allow wildlife to return to the PA.

Changes to wildlife movement and mortality risk are also predicted within the PA and Wildlife and Wildlife Habitat LSA during all Project phases. Changes to wildlife movement within the PA and areas of the Wildlife and Wildlife Habitat LSA are predicted through a combination of habitat alteration, fragmentation and edge effects, sensory disturbances (e.g., lighting, noise, vibration, smells), and impediments to movement such as physical barriers (e.g., fencing and mine infrastructure), and installation of the transmission line and Highway 655 realignment. Changes in wildlife mortality risk are also predicted due to existing and continued potential for vehicle collisions and interactions with equipment, human-wildlife conflict, and predator prey dynamics. Change in wildlife health is not anticipated for most species as exposure to CoPCs was considered negligible to low for all species; however, exposure risk of nickel was identified for the masked shrew (used as a representative for insectivorous mammals, including SAR

bats) and selenium for North American river otter and American mink. Although changes to the health of harvested wildlife species is not predicted, the physical presence of the Project could change Indigenous land use, which could lead to reductions in country food availability and accessibility that may affect physical health of Indigenous Nations through diet and nutritional changes. As described in Section 25.4.1.2, Canada Nickel will engage with Indigenous Nations regarding the development of the Wildlife Management Plan for the Project, which will include review of standard wildlife monitoring activities and adaptive management that will be conducted during all phases of the Project.

With the implementation of mitigation measures outlined in Section 25.4.1.2, Attachment 25.1, and Appendix E (Summary of Project Commitments) of the Impact Statement, residual effects on Apitipi Anicinapek Nation's Indigenous and Treaty Rights during all Project phases are anticipated to be adverse and moderate in magnitude within the PA, the MMB and the Indigenous Interests LSA, inclusive of timing considerations due to the seasonal movements of migratory species, the seasonal availability of harvested species, and the seasonal nature of certain cultural practices. Residual effects are short-term during the Construction and Decommissioning and Closure Phases and will occur as multiple irregular events. Residual effects are medium-term during the Operation Phase and will occur as multiple regular events. However, residual effects are considered reversible during all phases as they are primarily tied to Project activities (e.g., restricted/controlled access; clearing and grading; construction and operational noise and vibration; open pit dewatering) and it is anticipated that the PA, MMB, and Indigenous Interests LSA will return to current conditions once the open pit refills and Project activities, inclusive of progressive reclamation and revegetation activities, cease.

25.4.2 Change in Apitipi Anicinapek Nation's Physical and Cultural Heritage

This section provides the assessment of potential Project effects on Apitipi Anicinapek Nation's Physical and Cultural Heritage.

25.4.2.1 Project Pathways

All phases of the Project (construction, operation, decommissioning and closure) have the potential to affect Apitipi Anicinapek Nation's Physical and Cultural Heritage. Changes to Apitipi Anicinapek Nation's Physical and Cultural Heritage could result through the pathways identified in Table 25.1 in Section 25.1.5.

The conclusions in this section are informed by the results of engagement with Apitipi Anicinapek Nation, the literature review, related biophysical VC assessments presented in the Impact Statement, the CHSR (Appendix B.10 CHRS) and the Stage 1 AA (Appendix B.10 Stage 1 AA) conducted for the baseline investigations undertaken for the Impact Statement.

25.4.2.2 Mitigation and Enhancement Measures

Mitigation measures were selected based on the considerations described in Section 25.1.8 and are intended to be implemented in combination with Project design considerations and measures to mitigate and enhance potential effects of the Project on environmental resources and conditions that are connected to Apitipi Anicinapek Nation's Physical and Cultural Heritage. Attachment 25.1 provides Canada Nickel's responses and proposed mitigation measures for the concerns and recommendations made by Apitipi Anicinapek Nation.²³

Examples of key mitigation measures specific to archaeological and heritage sites include:

- Complete Stage 2 AA of areas identified as retaining archaeological potential in the Stage 1 AA (Appendix B.11 Stage 1 AA; Figure 25.3)
- If archaeological resources are found and determined to have cultural heritage value or interest (CHVI) then complete additional recommended work, such as Stage 3 archaeological assessment (Stage 3 AA) and, if necessary, Stage 4 mitigation of archaeological resources as per the MCM's *Standards and Guidelines for Consultant Archaeologists* (Ontario Ministry of Tourism and Culture 2011)
- Prepare and implement an Archaeological Resources Protection Plan
- Prepare and implement a Heritage Chance Find Protocol agreed upon between the Nations and Canada Nickel.
- Prepare and implement a worker education program about appropriate protocols in case of accidental discoveries
- Further assessment of changes to the PA through the life of the Project

The initial step in mitigation measures for archaeological resources will be the completion of recommended Stage 2 AA and then any subsequent follow-up work recommended from the Stage 2 AA (and subsequent reports, as applicable).

In addition, key construction staff will be trained in the recognition of basic archaeological artifacts such as Indigenous material culture (e.g., clay ceramics, lithic artifacts, and faunal remains), and Euro-Canadian material culture (e.g., refined ceramics, glassware, construction debris, and personal effects) in case any archaeological resources are found during Project construction. The staff training would also include a brief history of potential and documented historic use and occupation of the PA.

²³ A complete listing of measures can be found in Appendix E (Summary of Project Commitments).

If an archaeological resource is discovered within the PA during the construction phase, the Project's Heritage Chance Find Protocol will be implemented. All construction will cease within a radius of at least 20 m of the archaeological resource. In the event of a discovery, Canada Nickel will stop work immediately and inform MCM prior to the implementation of procedures and mitigation. A licensed archaeologist will be retained by Canada Nickel and a Stage 2 AA will be conducted with the participation of any interested Indigenous Nations. Follow-up Stage 3 or Stage 4 archaeological investigations will be conducted, as required. Once any archaeological resources with CHVI have been mitigated through excavation, construction will proceed.

Although it is not anticipated that human remains will be found, if a discovery is made within the PA, Canada Nickel will stop work immediately and contact the police or coroner, the Archaeology Programs Unit, and the Registrar or Deputy Registrar of the Cemeteries Regulation Section at the Ministry of Public and Business Service Delivery. Canada Nickel will also notify Indigenous Nations, as appropriate.

Canada Nickel will continue to engage Apitipi Anicinapek Nation to understand and mitigate the Project's impacts on its Indigenous interests, explore opportunities to enhance Project benefits, and consider its recommendations and input on Project decisions, including the development of management plans (e.g., Archaeological Resources Protection Plan). Through this ongoing collaboration, Canada Nickel aims to foster a positive long-term relationship with Apitipi Anicinapek Nation throughout the life of the Project.

25.4.2.3 Project Residual Effect

The analysis in this section incorporates the findings of the VC assessments found in the Impact Statement that are relevant to Apitipi Anicinapek Nation's Physical and Cultural Heritage.²⁴

Apitipi Anicinapek Nation reported the importance of maintaining and protecting its culture and traditions, which include access to and use of physical and cultural heritage sites and sacred places within its Traditional Territory (e.g., Lake Abitibi; archaeological and heritage sites; burial and cemetery sites; important landforms, trails and travel ways) (AAN 2022, 2023b, c; IAAC 2023d). Apitipi Anicinapek Nation did not identify physical or cultural heritage sites within the PA or Indigenous Interests LSA, however, as described in Section 25.2.5, the Nation identified areas used for harvesting, hunting and/or other cultural pursuits within the Indigenous Interests LSA that are connected to its cultural heritage.

Changes in air quality and noise (real or perceived) described in Section 25.4.1.3 may alter the quality of experience or necessary conditions at Apitipi Anicinapek Nation's physical and cultural heritage sites within the Indigenous Interests LSA during all Project phases. If Apitipi Anicinapek Nation experience changes in necessary conditions at physical and cultural heritage sites, the Nation may also experience loss or alteration of the ability to maintain and transmit Indigenous Knowledge and culture (e.g., language, histories, stories, practices) specific to these areas with its current and future generations.

²⁴ These include Chapter 10 Geology and Geologic Hazards, Chapter 11 Soil, Chapter 12 Atmospheric Environment, Chapter 13 Acoustic Environment, and Chapter 20 Health.

As described in Section 25.4.1.3, a measurable change in access is also predicted within the PA and the MMB as access will be restricted and/or controlled during all Project phases. However, the Project is not expected to create a change or disruption that widely reduces or restricts Apitipi Anicinapek Nation's ability to access its physical and cultural heritage sites within the Indigenous Interest LSA and its broader Traditional Territory to the extent that the Nation cannot continue at current activity levels. Site access is a key element considered in the Impact Benefit Agreement under negotiation with Apitipi Anicinapek Nation and will include the conditions for Indigenous Nations to access select areas of the PA and MMB for the exercise of Indigenous and Treaty Rights, acknowledging that, for safety and operational reasons, it may be necessary for Canada Nickel to restrict access to certain lands and/or activities within the PA and MMB.

Changes in terrain stability and surficial geology will occur within the PA during construction and operation of the Project, however these changes will not extend beyond the PA. Changes to soils and sediment are similarly predicted to be limited to the PA during all Project phases. Changes predicted for geology, soil and sediment within the PA may affect the integrity of surface or subsurface physical and cultural heritage sites (if present). The predicted changes in geology, soils and sediment are not expected to extend to the Indigenous Interests LSA.

The potential residual effect to archaeological and heritage resources (if present) within the PA is the loss of information resulting from alterations to site contents or context prior to, or without, the implementation of mitigation measures. Although no archaeological or heritage sites have been identified within the PA to date, the Stage 2 AA will determine the presence or absence of these features prior to construction, and any sites (if present), will be subject to the requirements of the MCM (2011). With the implementation of mitigation measures to offset the loss of information resulting from site alteration (if present), no adverse residual effects to physical/tangible archaeological and heritage sites are anticipated. Adverse residual effects are however predicted for Apitipi Anicinapek Nation's intangible physical and cultural heritage (e.g., storied places; named places; sacred sites) if present within the PA and MMB due to the predicted alterations in access and necessary conditions described above.

With the implementation of mitigation measures outlined in Section 25.4.2.2 and Attachment 25.1 and Appendix E, residual effects on Apitipi Anicinapek Nation's Physical and Cultural Heritage are anticipated to be adverse and low in magnitude within the PA, MMB and the Indigenous Interests LSA during all Project phases, inclusive of timing considerations due to the seasonal use of physical and cultural heritage sites, and due to connections between cultural heritage and cultural practices dependent upon the movements of migratory species and/or availability of harvested species. Residual effects are short-term during the Construction and Decommissioning and Closure Phases and will occur as multiple irregular events. Residual effects are medium-term during the Operation Phase and will occur as multiple regular events. However, residual effects are considered reversible during all phases as they are primarily tied to Project activities (e.g., restricted/controlled access; clearing and grading; construction and operational noise and vibration) and it is anticipated that the PA, MMB, and Indigenous Interests LSA will return to current conditions once Project activities, inclusive of progressive reclamation and revegetation activities, cease.

25.4.3 Change to Governance, Health, Social and Economic Conditions of Apitipi Anicinapek Nation

This section provides the assessment of potential Project effects on the Governance, Health, Social and Economic Conditions of Apitipi Anicinapek Nation.

25.4.3.1 Project Pathways

All phases of the Project (construction, operation, decommissioning and closure) have the potential to affect the Governance, Health, Social and Economic Conditions of Apitipi Anicinapek Nation. Changes to Apitipi Anicinapek Nation's Governance, Health, Social and Economic Conditions could result through the pathways identified in Table 25.1 in Section 25.1.5.

The conclusions in this section are informed by the results of engagement with Apitipi Anicinapek Nation, the literature review, and related biophysical and socio-economic VC assessments presented in the Impact Statement.

25.4.3.2 Mitigation and Enhancement Measures

Mitigation measures were selected based on the considerations described in Section 25.1.8 and are intended to be implemented in combination with Project design considerations and measures to mitigate and enhance potential effects of the Project on environmental resources and conditions that are connected to Apitipi Anicinapek Nation's Governance, Health, Social and Economic Conditions. Attachment 25.1 provides Canada Nickel's responses and proposed mitigation measures for the concerns and recommendations made by Apitipi Anicinapek Nation.²⁵

Canada Nickel will continue to engage Apitipi Anicinapek Nation to understand and mitigate the Project's impacts on its Indigenous interests, explore opportunities to enhance Project benefits, and consider its recommendations and input on Project decisions, including the development of management plans (e.g., CEPP, Traffic Management Plan; Health and Medical Services Plan). Through this ongoing collaboration, Canada Nickel aims to foster a positive long-term relationship with Apitipi Anicinapek Nation throughout the life of the Project.

25.4.3.3 Project Residual Effect

The analysis in this section incorporates the findings of the VC assessments found in the Impact Statement that are relevant to Apitipi Anicinapek Nation's Governance, Health, Social and Economic Conditions.²⁶

²⁵ A complete listing of measures can be found in Appendix E (Summary of Project Commitments).

²⁶ These include Chapter 10 Geology and Geologic Hazards, Chapter 11 Soil, Chapter 12 Atmospheric Environment, Chapter 13 Acoustic Environment, Chapter 14 Groundwater, Chapter 15 Surface Water, Chapter 16 Vegetation, Riparian and Wetland Environments, Chapter 17 Fish and Fish Habitat, Chapter 18 Bird and Bird Habitat, Chapter 19 Wildlife and Wildlife Habitat, Chapter 21 Health, 22 Social Conditions, Chapter 23 Economic Conditions.

Social determinants of Indigenous Peoples health are connected to environmental, cultural, psychological, physical, spiritual and economic factors (Loppie and Wien 2022). Encompassed within these are health activities, geophysical environments, employment and income, education, food security, knowledge systems, community infrastructure, resources and capacities, environmental stewardship, cultural resurgence, Indigenous self-determination and the effects of colonial ideologies and colonial governance (Loppie and Wien 2022). Indigenous health is also influenced by wellbeing. Vulnerable populations, including members of Indigenous Nations experiencing inequities in the social determinants of health, are more likely to carry an additional burden of ill health as well as be restricted from access to resources that might ameliorate these conditions (Loppie and Wien 2022; see Section 25.4.4.3).

Residual effects are anticipated on Apitipi Anicinapek Nation's Indigenous and Treaty Rights and Physical and Cultural Heritage during all Project phases through changes in access, necessary conditions, and the quality, quantity, or distribution of resources (including surface water and ground water) that are connected to Apitipi Anicinapek Governance, Health, Social and Economic Conditions within the PA, MMB and Indigenous Interests LSA (Sections 25.4.1.3 and 25.4.2.3. These residual effects are linked to Apitipi Anicinapek Nation's traditional (e.g., trade) and commercial (e.g., trapping) economies and other subsistence-based livelihoods, as well as the Nations' overall health and social conditions (e.g., ability to harvest sufficient resources for other Nation members and/or to supply for community events). Changes in access to the PA, MMB and areas within the Indigenous Interests LSA will also result in an alteration to Apitipi Anicinapek Nation's decision-making abilities regarding land and water, and ability to uphold cultural traditions, laws, and governance systems that inform how rights are exercised within the PA and MMB. A summary of existing services offered to or accessed by Apitipi Anicinapek Nation (both on and off reserve) is provided in Section 25.2.3.

As described in Section 25.4.1.3, the Project is expected to remove vegetation and wetland areas during construction activities that may be used as country food or for medicinal purposes by Indigenous Nations. Development of the PA will also remove habitat suitable for wildlife, vegetation or fish species harvested for consumption. Project-related transportation may cause wildlife mortality and reduce the availability of traditionally harvested resources. Project-related noise, light and vibration may also alter the availability of traditional resources. Changes in air and water quality and the quality of country foods are also predicted within the Indigenous Interests LSA. These changes may result in changes to Apitipi Anicinapek Nation health through alteration of harvesting and consumption activities, and/or through exposures associated with modelled changes in surface water (i.e., fish and potable water consumption). For consumption of fish and potable water, modelled concentrations are less than guidelines that are protective of health (Health Canada 2022, 2024). As it relates to surface water quality, follow-up and monitoring measures will be implemented at key Project locations to meet regulatory requirements related to surface water. The focus on monitoring activities will be at the final discharge point locations, as well as upstream and downstream locations, and this will include monitoring of surface water and fish in each watershed. For changes in air quality, the AQMP will specify the mitigation measures for the management and reduction of air emissions during Project construction and operations and the proposed ambient air quality monitoring program.

Actual or perceived changes in air and water quality and the quality of country foods may lead to changes in the way that members of Apitipi Anicinapek Nation harvest or eat traditional foods within the Indigenous Interests LSA, and therefore alter food security, which could lead to physical health changes. Another barrier to participation in harvesting activities and cultural events associated with mining, which can affect mental health conditions including personal identity, self-esteem, and healthy coping mechanisms (Loppie and Wien 2022), may result from time limitations due to employment and shift work (PDAC 2022). However, Canada Nickel has committed to actions to provide flexibility in work schedules to enable the continued participation of Indigenous employees in traditional and cultural activities.

Further, as described in Section 25.2.3.1, Apitipi Anicinapek Nation members reported that their relationship with the land and ability to participate in traditional harvesting practices is important to the health and well-being of the community (AAN 2024a).

Indigenous Peoples and low-income (including persons living with a disability or lone parent families) households may be more susceptible to potential changes in Project-related cost of living and food insecurity as these populations already experience disproportionate rates of food insecurity. Therefore, any potential changes to cost of living as a result of the Project may place these populations and their families at a disadvantage and risk of becoming food insecure. Potential changes of cost of living due to the Project may also contribute to these segments of the population struggling to find safe and affordable housing, thereby risking increased homelessness or overcrowding.

Project workers may place additional demands on local health services if they require health care due to illness or workplace injuries. To reduce adverse effects on local health care services and facilities, Canada Nickel will prepare a Health and Medical Services Plan (HMSP), which will outline the services available to employees, as well as policies and training to promote and encourage healthy behaviours. A medical room and first aid stations will be provided on-site, and medical services will be provided through the on-site presence of medical personnel. Canada Nickel will employ a doctor in the who will see workers for occupational related illnesses and emergencies. Twenty-four-hour medical services will be available through virtual doctors to assist employees with non-occupational-related illnesses. The Project HMSP will also provide information on on-site injury/illness prevention and management, and communicable disease management. It is expected that for conditions that require long-term care, non-local workers will continue to use the services of family physicians or specialists located in their home communities.

Canada Nickel anticipates that workers will commute daily from existing residences in communities located within approximately a one-hour drive of the Project site, with the possibility that some workers may choose to drive further distances based on their personal preference or circumstances. Though Canada Nickel wishes to hire primarily from local and Indigenous nations, workers from outside of the region may be required to meet the workforce demand of the Project.

Demands on other local emergency services, including police and fire protection, will be managed through Project planning and management strategies, including incorporating design mitigation measures and preparing safety and environmental management plans in accordance with applicable requirements and industry best practices. Canada Nickel will have discussions with emergency services personnel in advance of construction and operation, which will inform Project and emergency services planning. There

will be fire prevention equipment on-site and fire prevention measures will be outlined in the Project Emergency Preparedness and Response Plan (EPRP). Project personnel will also be trained in fuel handling, equipment maintenance, and fire prevention and response measures.

Canada Nickel will reduce effects on local utilities through Project design. For instance, domestic sewage during the operations phase will be treated by an appropriately sized, technically acceptable method, such as an on-site sewage treatment system. Domestic sewage waste will be limited because there will not be a Project accommodation complex at the Project site. Primary and secondary collection ponds will provide water for mine operations. These will be designed with sufficient capacity to support the retention and treatment of contact water, and to provide water for processing operations.

Potable water for the Project will be supplied by groundwater sourced from water wells located within the PA. The fresh water will be treated to meet provincial drinking water standards. The Project's potable water system will not draw from any municipal water supply.

There are four landfills within the District of Cochrane and plans are being developed to expand the capacities of two of them. Canada Nickel will implement a Waste Management Plan for the Project to manage and reduce Project-related waste. Non-hazardous solid wastes will be recycled, reused, or collected in a central secure area onsite and then disposed of in a licensed waste receiver facility. Hazardous liquid and solid waste will be collected in a secure, enclosed location and transported off-site to a licensed hazardous waste facility.

Power to the site will be provided by a future 230 kV transmission line that is being designed, constructed and operated by a third-party as part of an independent transmission expansion project that is expected to promote stronger electricity reliability for northern communities and Indigenous nations that will connect the Porcupine Substation in Timmins. The line is anticipated to be sufficient to supply the Project with the necessary operating power. This is not anticipated to impact local power availability and may encourage greater availability through new or improved infrastructure to meet increased demand.

It is unlikely that non-local construction workers will bring families with them for Project work because the construction phase will only last about three years. Therefore, it is not expected that schools in the region will see increased demand during the Project construction phase. During the approximately 40-year operations phase, workers could bring families to live in the region. Schools in northern Ontario have experienced declining enrollment for decades; however, some schools have seen modest increases since 2022. Given their history, it is likely that there is spare capacity at regional schools to accommodate families of operations employees.

With respect to pre-school and daycare services and infrastructure, the District of Cochrane is experiencing a shortage of early childhood educators (ECEs), which is making it challenging for families to acquire childcare. Should Project employees move to the region with young children, childcare services could see additional demand. The childcare shortage could also present a barrier to residents with children, particularly women, seeking Project employment. Having acknowledged the lack of childcare availability in the District, the Ontario Minister of Education has announced the creation of 189 new childcare spaces and the Mayor of Timmins has addressed the need for an ECE recruitment and retention strategy.

The Project is not expected to affect parks and protected areas or Indigenous Reserve lands. With the application of mitigation and enhancement measures, including hiring from local communities where possible, provision of a company doctor and virtual health services, Project design for utilities, planned work rotations, and implementation of a Traffic Management Plan, the Project's 'adverse' residual effects on services and infrastructure (change in demand on services and infrastructure, change in accommodation availability, and change in demand for transportation infrastructure) are expected to occur in the Social Conditions LSA/RSA throughout construction and operations and will be reversible following the decommissioning and closure phase. Canada Nickel is exploring opportunities with Indigenous partners and local entrepreneurs to foster the development of workforce accommodations. In addition, surrounding communities have developed plans to increase housing availabilities that will further mitigate effects of the Project on housing should those projects proceed.

An accommodations complex (or similar) is not proposed to be developed as part of the Project due to the close proximity of local communities. Canada Nickel anticipates that resident workers who obtain Project employment will commute daily from existing communities/residences, which are located within approximately one hour drive of the Project site, with the possibility that some workers may choose to drive further distances based on their personal preference or circumstances.

The Project will have a peak workforce of 1,998 full-time equivalents (FTEs) and an average of 708 FTEs over the life of the mine. Shift rotations during construction were not available at the time of writing, but during operations, it is expected that there will be four rotating crews that work 12-hour shifts and on average 42-hours a week. At a peak of 1,371 employees during operations, divided by four crews, each crew will have up to 343 workers.

It is estimated that there will be a deficit in required labour for the mining industry, and that the use of mobile workers will be required to fulfill this void. By 2037, it is estimated that there will be a potential shortfall of 23% to 30% of vacancy rates in the mining industry within the Social Conditions LSA. However, it is also estimated that approximately 30% of the current mining workforce will be retired by 2027, leaving a 44% vacancy rate of positions needing replacements.

Canada Nickel will aim to increase the percentage of the local workforce and reduce the requirement to hire workers from outside the region by providing training opportunities to local residents. Canada Nickel is working with the Northern Centre for Advanced Technology (NORCAT) to develop courses that will be administered by Northern College, which will include apprenticeship programs as well as specialized training for vehicle operation. This program will be run multiple times to provide an opportunity to equip locals with the skills needed to work on the Project. Further, Canada Nickel will develop a Diversity and Inclusion Policy, which does not discriminate against employees or contractors of the company based on race, ethnicity, physical/mental capabilities, sexual orientation, or Indigeneity, and requires employees to adhere to respectful workplace practices.

Results of a housing needs assessment indicate that there is sufficient supply of owned homes (as opposed to rentals) in the District of Cochrane. As described in the Social and Economic Conditions Report (Appendix B.9 of the Impact Statement), active residential listings for the Timmins, Cochrane, and Timiskaming Districts at the end of October 2023 were 23.9% higher than they were in October 2022. In addition, housing sales have been decreasing across Northeastern Ontario, with the biggest decline

happening in Timmins. However, members of the Project's Socio-Economic Committee, which is comprised of members of the Cochrane District, including representatives for service providers and municipal governments, have suggested that the supply of owned housing as described in the housing needs assessment does not represent the current condition of housing in the region. The committee stated that the existing stock of home ownership housing is not adequate to meet the current demand. According to members of the Socio-Economic Committee and relevant literature, certain sub-populations, including seniors, youth, and low-income families, are not accommodated well by existing housing in the Social Conditions LSA and may be disproportionately affected by the Project's potential demand on housing availability.

Steps are also being taken throughout the District of Cochrane to increase the supply of appropriate housing. For instance, the Town of Smooth Rock Falls is encouraging lot development through its Municipal Property Acquisition and Sale Program and is developing its waterfront with the construction of 435 residential units (Town of Smooth Rock Falls and JLR 2022). Timmins is hoping to expand two subdivisions by adding 150 new homes and The Town of Cochrane is working on a plan to sell residential lots for as low as \$10 (City of Timmins 2024; Lentz-McGrath 2024)

Ontario Aboriginal Housing Services (OAHS) is a corporation with a mandate to provide safe and affordable housing to urban and rural First Nation, Inuit, and Métis people living off-Reserve in Ontario. OAHS provides a variety of housing options along the housing continuum starting at rent geared-to-income units and currently ending with assisted homeownership and home repair assistance. Rents are set at rates ranging from 25% of gross income (core need) to 80% of market (affordable) (OAHS 2021). OAHS is the largest Indigenous non-profit housing provider in Ontario with 2,700 homes throughout the province (Grech 2023). In 2020, CDSSAB and OAHS established a partnership to reduce homelessness, increase options for housing Indigenous populations, and reduce housing waitlist managed by CDSSAB (CDSSAB 2021).

In September 2023, the Timmins City Council donated 2.9 ha of City-owned land to OAHS so it can build two three-storey 62-unit affordable housing complexes for a total of 124 units. Construction on the housing complexes is expected to begin in July 2026.

The Timmins Native Non-Profit Housing Corporation aims to provide quality affordable housing to families of Indigenous descent in Timmins. It is overseen by a volunteer Board of Directors and managed by two staff: an Operations Coordinator and an Administrative Clerk. The Timmins Native Non-Profit Housing Corporation is funded by the Government of Canada through the CMHC. It manages 36 housing units made up of two-, three- and four-bedroom units. There are 20 individual and semi-detached units and 16 row housing units in Timmins.

The presence of the Project may create positive effects for Apitipi Anicinapek Nation if potential demands on accommodations result in efforts to increase the stock of permanent and temporary housing in the Social Conditions LSA and RSA. The Project workforce will contribute economically to the Social Conditions LSA and RSA through property and income taxes, representing a potential expansion of municipal tax bases and thus, in turn, may help pay for service providers to re-size appropriately for the increased population.

To manage adverse effects on accommodation availability, Canada Nickel will implement hiring practices to employ locally to the extent possible. It will work with education institutions to provide training in skills that will better prepare residents for Project employment. Canada Nickel will encourage non-local Project construction workers to share rooms at temporary accommodations, including hotels and motels, as well as rental units. Canada Nickel will communicate Project requirements for accommodation to local service providers so they may prepare for periods of increased demand. Northeastern Ontario has experience hosting mining projects and their workforces. It is likely that mine operations workers in northern Ontario will commute to their hometowns even for long-term work, such as Project operations. Canada Nickel will encourage home sharing for those operations workers who do not bring families to the Social Conditions LSA. Canada Nickel will also communicate Project activities and accommodations requirements to municipal authorities. Some past and existing mining projects in the region have had their workforce accommodations developed by independent accommodations providers. In addition, Canada Nickel has plans to undertake an accommodations study and is engaging with third parties, including Indigenous Nations, which may result in an agreement for the provision of Project accommodations. This study may provide insight into additional mitigation and management measures for Project accommodation. Historically, independent accommodation providers in the region have followed the trends of demand and have had the capacity to provide accommodations for temporary workers when required for large projects. The same is expected in the case of the Project.

Despite mitigation and management measures, members of vulnerable groups, including Indigenous subgroups, may still experience differential effects on services and infrastructure in the region. The Project is committed to reducing these differential effects to the extent possible. A community feedback tool or process will be implemented to receive and address community concerns and complaints with the aim of reducing adverse effects of the Project on Indigenous subgroups. Additional information regarding disproportionately distributed residual effects on Indigenous subgroups is provided in Section 27.4.4.3.

As described in Section 25.2.4, Apitipi Anicinapek Nation emphasized the importance of maintaining or improving the ability of members to earn a living and to increase economic benefits, investment and inclusion for its members and local Indigenous businesses related to development activities within its Traditional Territory (AAN 2022, 2023b). The Project is anticipated to result in both positive and adverse effects on Indigenous employment, business, and economy within the region during all Project phases. Positive effects include direct, indirect, and induced employment and labour income in the Economic Conditions LSA and other parts of Ontario and Canada. Increased employment is expected to have positive effects on Indigenous unemployment rates, increase income levels for Indigenous individuals (and families) who secure employment with the Project and will provide valuable employment experience that can be leveraged by Indigenous workers to secure employment with other projects/employers following completion of Project-related work. Canada Nickel will also implement measures specifically aimed at increasing economic participation among local and Indigenous businesses. Adverse effects on regional business (including Indigenous businesses) are however predicted during all Project phases, largely due to Project wages being greater than existing conditions, albeit consistent with wages in the mining industry. Adverse effects are also predicted due to the potential for Project employment to be deemed more desirable than other forms of employment in the Economic Conditions LSA, which can result in increased competition for labour and upward pressure on wages (to attract and retain workers).

With the implementation of mitigation measures outlined in Section 25.2.3.1.2 , Attachment 25.1 and Appendix E (Summary of Project Commitments) of the Impact Statement, residual effects on the Governance, Health, Social and Economic Conditions of Apitipi Anicinapek Nation are anticipated to be both adverse and positive and low in magnitude within the PA, MMB and the Indigenous Interests LSA during all Project phases, inclusive of timing considerations due to the seasonal movements of migratory species, the seasonal availability of harvested species, and the seasonal nature of certain cultural practices. Residual effects are short-term during the Construction and Decommissioning and Closure Phases and will occur as multiple irregular events. Residual effects are medium-term during the Operation Phase and will occur as multiple regular events. However, residual effects are considered reversible during all phases as they are primarily tied to Project activities (e.g., restricted/controlled access; presence of Project workforce; duration of contract/employment) and it is anticipated that the PA, MMB, and Indigenous Interests LSA will return to current conditions once Project activities, inclusive of progressive reclamation and revegetation activities, cease.

25.4.4 Summary of Project Residual Effects

Table 25.4 summarizes Project residual effects on Apitipi Anicinapek Nation's rights and interests. The assessment of disproportionately distributed residual effects on Apitipi Anicinapek Nation's interests is provided in Section 25.4.4.3.

Table 25.4 Project Residual Effects on Apitipi Anicinapek Nation's Interests

Residual Effect	Residual Effects Characterization							
	Project Phase	Direction	Magnitude	Geographic Extent	Timing	Duration	Frequency	Reversibility
Change to Apitipi Anicinapek Nation's Indigenous and Treaty Rights	C/O/D	A	M	PA/MMB/LSA	A	ST/MT	MIR/MRE	R
Change in Apitipi Anicinapek Nation's Physical and Cultural Heritage	C/O/D	A	L	PA/MMB/LSA	A	ST/MT	MIR/MRE	R
Change to Governance, Health, Social and Economic Conditions of Apitipi Anicinapek Nation	C/O/D	A/P	L	PA/MMB/LSA	A	ST/MT	MIR/MRE	R
<p>KEY: See Table 25.2 for detailed definitions</p> <p>Project Phase C: Construction O: Operations D: Decommissioning and closure</p> <p>Direction: P: Positive A: Adverse N: Neutral</p> <p>Magnitude: N: Negligible L: Low M: Moderate H: High</p> <p>Geographic Extent: PA: Project Area LSA: Local Study Area MMB: Modelled Mine Boundary RSA: Regional Study Area</p> <p>Timing: NA: Not Applicable A: Applicable</p> <p>Duration: ST: Short-term MT: Medium-term LT: Long-term</p> <p>Frequency: S: Single event MIR: Multiple Irregular event MRE: Multiple Regular event C: Continuous</p> <p>Reversibility: R: Reversible I: Irreversible</p>								

25.4.4.1 Summary of Adverse Residual Effects

Adverse residual effects are anticipated on Apitipi Anicinapek Nation's Indigenous and Treaty Rights, Physical and Cultural Heritage, and Governance, Health, Social and Economic Conditions during all Project phases. Changes predicted within the biophysical environment (e.g., effects on terrestrial and aquatic resources), and changes predicted for access to lands and waters, social and economic conditions and cultural/experiential values within the PA, MMB and Indigenous Interests LSA will result in adverse residual effects ranging from low to moderate in magnitude on Apitipi Anicinapek Nation's exercise of Indigenous and Treaty Rights.

Timing is applicable during all Project phases due to the seasonal movements of migratory species, the seasonal availability of harvested species, and the seasonal nature of certain cultural practices. Residual effects are short-term during the Construction and Decommissioning and Closure Phases and will occur as multiple irregular events. Residual effects are medium-term during the Operation Phase and will occur as multiple regular events. However, residual effects are considered reversible during all phases as they are primarily tied to Project activities (e.g., restricted/controlled access; clearing and grading; construction and operational noise and vibration; open pit dewatering; presence of Project workers) and it is anticipated that the PA, MMB, and Indigenous Interests LSA will return to current conditions once the open pit refills and Project activities, inclusive of progressive reclamation and revegetation activities, cease.

25.4.4.2 Summary of Positive Changes

Positive residual effects are anticipated on Apitipi Anicinapek Nation's interests within the PA, MMB, and Indigenous Interest LSA and are described below in relation to VCs considered in the Impact Statement. Positive residual effects are largely connected to benefit agreements and Indigenous-centered mitigation and enhancement measures identified for social and economic conditions during all Project phases, involvement of Indigenous Nations in the development of Project plans (e.g., CEPP, Archaeological Resources Protection Plan; Transportation Management Plan) and through site rehabilitation and restoration efforts following decommissioning and closure activities (i.e., forward looking for the benefit of future generations).

The Project is anticipated to result in positive effects on employment, business, and the economy during all Project phases (construction, operations, and decommissioning) in the form of direct, indirect and induced employment and labour income within the Economics LSA, other local and regional economies and at the provincial and federal level. Increased employment is expected to have positive effects on Indigenous unemployment rates, increase income levels for Indigenous individuals (and families) who secure employment with the Project and will provide valuable employment experience that can be leveraged by Indigenous workers to secure employment with other projects/employers following completion of Project-related work. Canada Nickel will also implement measures specifically aimed at increasing economic participation among local and Indigenous businesses.

In addition, the presence of the Project may create positive effects for Apitipi Anicinapek Nation if potential demands on accommodations result in efforts to increase the stock of permanent and temporary housing in the region.²⁷ The Project workforce will contribute economically to the region through property and income taxes, representing a potential expansion of municipal tax bases and thus, in turn, may help pay for service providers to re-size appropriately for the increased population.

25.4.4.3 Disproportionately Distributed Residual Effects on Apitipi Anicinapek Nation Subgroups

Canada Nickel recognizes that because of the location of the PA in Apitipi Anicinapek Nation's Traditional Territory, as provided by the Nation, some effects, such as alteration to the current use of lands and resources may affect Apitipi Anicinapek Nation disproportionately in comparison with the non-Indigenous population. While the Project will not affect parks and protected areas or Abitibi 70, Project effects on Crown lands are predicted.

Based on the predicted residual effects described in Section 25.4, the Project may disproportionately affect Apitipi Anicinapek Nation's subgroups in the following ways:

- Reduced quality of the harvesting experience, as well as access to fishing or harvesting sites, which may disproportionately affect Apitipi Anicinapek Nation members who rely more heavily on these environments and their resources for food, social and ceremonial (FSC) purposes and/or to provide for Elders, hereditary leaders, and others in the community, as well as for feasting or other culturally important events, and for other purposes (e.g., spiritual, trade)
- Reduced decision-making and reduced access to areas where social and economic activities occur (e.g., commercial bait fishing), which may disproportionately affect Apitipi Anicinapek Nation members who rely more heavily on these environments and their resources for income or FSC purposes and for other purposes (e.g., cultural, economic, spiritual, trade)
- Reduced access and quality of experience at physical and cultural heritage sites, which may disproportionately affect Apitipi Anicinapek Nation members who rely more heavily on these places for knowledge transmission, sharing cultural teachings and history, and spirituality
- Reduced access and travel, which may disproportionately affect Apitipi Anicinapek Nation members who rely more heavily on established travel and access routes (e.g., snowmobile trails) to access harvesting sites and physical and cultural heritage sites, to maintain trade relationships, to maintain income or for FSC purposes and for other cultural pursuits (e.g., spiritual, trade)

Canada Nickel recognizes that airborne CoPCs, noise and light exposure may result in changes to physical health that could disproportionately affect Apitipi Anicinapek Nation in relation to traditional land use and employment conditions. Mitigation and enhancement measures are designed to limit indirect and direct effects to physical health.

²⁷ See Chapter 22 (Social Conditions).

Canada Nickel recognizes that Elders, youth, women, low-income families and other members of Apitipi Anicinapek Nation may experience disproportionate adverse effects on infrastructure and services compared to the general population. With respect to pre-school and daycare services and infrastructure, the District of Cochrane is experiencing a shortage of early childhood educators, which is making it challenging for families to acquire childcare. Should Project employees move to the region with young children, childcare services could see additional demand. It is therefore predicted that Elders, youth, women, low-income families and other Apitipi Anicinapek Nation members, may experience disproportionate effects when it comes to accessing childcare and appropriate housing in the region. Mitigation and enhancement measures are designed to decrease Project effects to these groups. Local strategies to recruit and retain Early Childhood Educators and the planned opening of nearly 200 new childcare spaces in the District of Cochrane should increase access to childcare and reduce the magnitude of disproportionate effects on Apitipi Anicinapek Nation.

Potential Project-related changes in the cost of living and food security are expected to have disproportionate effects on Apitipi Anicinapek Nation. Since a disproportionate number of youth and Indigenous Peoples in the District of Cochrane are experiencing, or are at risk, of homelessness, these conditions may be exacerbated by the Project. The potential increase in food and housing insecurity is also associated with disproportionate adverse effects to mental health and wellbeing for members of Apitipi Anicinapek Nation. Canada Nickel will address Project-related demands on accommodation availability in the Accommodations Plan for the Project and work with municipalities to increase the supply of housing to reduce adverse effects.

Indigenous women and girls experience disproportionate rates of violence compared to the general population. For instance, 46% of Indigenous women experience sexual violence in their lifetime compared to 33% of non-Indigenous women (Heidinger 2021). In response to the disproportionate rates of violence experienced by Indigenous women and girls, including the 2SLGBTQIA+ peoples, the National Inquiry into Missing and Murdered Indigenous Women and Girls (MMIWG) was launched in 2016 (GoC 2020). The National Inquiry into MMIWG discussed how the dehumanizing process and structure of colonization has contributed to discrimination, racism and is foundational to the social inequities that contribute to the disproportionate rates of (National Inquiry into Missing and Murdered Indigenous Women and Girls 2019).

Given that majority of transient workers are anticipated to be men, there remains a degree of safety concerns related to sexual behaviours in the community. Indigenous women and girls and the 2SLGBTQIA+ community are particularly at risk of being victims of gender-based violence as there is an overrepresentation of intimate partner violence and gender-based violence among these populations. As described in Section 25.2.3.1.1, Apitipi Anicinapek Nation expressed concern regarding impacts on social well-being from in and out migrations, including crime rates, addiction, mental health, impacts to women, girls, and 2SLGBTQIA+, and discrimination and violence towards Indigenous peoples.

The number of transient workers required to observe an increase over existing rates in community crime rates is uncertain; however, Canada Nickel will implement and enforce several policies, procedures and training that are anticipated to reduce potential unethical behaviour from workers including having workers adhere to a code of conduct and ethics policy, a violence and harassment policy and a drug and alcohol policy. Failure to comply to these policies can result in worker disciplinary action including

termination. Canada Nickel will have internal and external community feedback mechanisms to capture Project-related comments and concerns from community members, which can include unethical observations. Canada Nickel will investigate and document each complaint accordingly and take any necessary follow-up actions.

Canada Nickel is committed to providing cultural awareness training to enhance the outside workforces' understanding of Indigenous histories and cultures and to describe the root causes of inequities that Indigenous communities experience. Canada Nickel will engage with Apitipi Anicinapek Nation to develop the cultural awareness training so that it includes topics of importance to the Nations (e.g., Treaty 9; MMIWG). Additionally, Canada Nickel will implement a harassment policy and an internal whistleblower mechanism for confidential reporting of workplace harassment to mitigate disproportionate effects to Indigenous women and 2SLGBTQQIA+ employed by the Project.

Positive effects (direct, indirect, and induced) of the Project on employment and labour income in the Economic Conditions LSA are expected to be unevenly distributed as it is likely that a larger percentage of non-Indigenous men will be employed on the Project than other subpopulations. Mitigation and enhancement measures are designed to increase participation among underrepresented groups on the Project who will disproportionately benefit from these measures (e.g., Indigenous men and women). Canada Nickel will also implement measures specifically aimed at increasing economic participation among local and Indigenous businesses. As a result, a disproportionate amount of Project contracting and procurement in Ontario is expected to be realized by Apitipi Anicinapek Nation and other Indigenous Nations. However, the Project is not expected to measurably reduce economic inequities across the Economic Conditions LSA.

With the use of mitigation and enhancement measures described throughout the Impact Statement, including the development and implementation of a feedback process to hear concerns from residents and members of vulnerable groups, Canada Nickel aims to reduce the differential effects on Apitipi Anicinapek Nation's sub-groups.

25.5 Assessment of Cumulative Effects

The assessment of cumulative effects is initiated with a determination of whether two conditions exist:

- the Project is assessed as having adverse residual effects on Indigenous interests
- the adverse residual effects from the Project overlap spatially and temporally with residual effects of other physical activities on Indigenous interests

Where these two conditions are met, then the assessment of cumulative effects continues. If these two conditions are not met, there is no expectation that the Project will contribute cumulatively to residual effects, and further assessment is not warranted.

As described in Section 25.4, residual effects are predicted on Apitipi Anicinapek Nation's interests. A regional historic overview (RHO) is provided in Chapter 29 of the Impact Statement (Cumulative Effects Assessment). The RHO provides a summary of natural and human conditions, on a regional basis, prior to baseline conditions. The reason for an RHO is to acknowledge such past conditions and improve the context by which the assessment baseline, and hence also the VC assessments, reflect past conditions. Canada Nickel has adopted a historical timeline of 1905 to present as the focus of this RHO. This timeline was selected because Treaty 9, which covers the region in which the Project is located, was signed between 1905 and 1906 (GoC 1964). Furthermore, to provide a larger environmental and cultural context for the events considered in the historical timeline, the RHO provides a high-level overview of the natural and human history of the region prior to 1905. In consideration of the history and predicted trajectory of anthropogenic disturbance and land use in the Indigenous Interests RSA, further assessment is warranted.

This section therefore provides the assessment of potential cumulative effects on Apitipi Anicinapek Nation's interests for those effects from the Project that have the potential to act cumulatively with the effects of other past, present and reasonably foreseeable future physical activities in the region.

Existing environmental conditions reflect cumulative effects from past and present physical activities and are accounted for within the residual Project effects assessment. Future physical activities in the cumulative effects assessment include those that are considered to be certain to proceed and generally includes physical activities that are reasonably foreseeable. More specifically, certain and reasonably foreseeable future physical activities considered in the cumulative effects assessment are restricted to those that meet one or more of the following criteria:

- are currently undertaking site preparation or are under construction
- have received regulatory approval
- have been publicly announced with applications filed with a defined project execution period and with sufficient project details for consideration
- are currently undergoing an impact assessment/environmental assessment
- are in a permitting process
- are identified in an approved development plan

To complete the cumulative effects assessment, a Project Inclusion List (Attachment 29.1 in Chapter 29 [Cumulative Effects Assessment]) has been developed to identify the past, present and future physical activities that may interact cumulatively with the effects of the Project.

The identification and selection of specific physical activities to date was based on a conservative assumption that a potential interaction may exist due to the nature of that activity, the surrounding environment, and the VCs assessed. Those physical activities in the RSAs for the VCs and Indigenous Interests for the Project have been identified from readily accessible records, including federal, provincial and municipal government records, press releases and GIS mapping applications. The list of past, present and future physical activities included in Attachment 29.1 (Chapter 29 [Cumulative Effects Assessment]) is based on public information available up to 2024.

Since not all future physical activities may proceed, the cumulative effects assessment should be considered conservative.

25.5.1 Residual Project Effects Likely to Interact Cumulatively

The Project residual effects identified in Section 25.4 likely to act cumulatively with physical activities found in Attachment 29-1 Appendix A (Project Inclusion List) in Chapter 29 (Cumulative Effects Assessment) are listed in Table 25.5.²⁸

Table 25.5 Interactions with the Potential to Contribute to Cumulative Effects to Apitipi Anicinapek Nation's Rights and Interests

Physical Activities with Potential for Cumulative Effects	Apitipi First Nation Rights and Interests		
	Change to Apitipi Anicinapek Nation's Indigenous and Treaty Rights	Change in Apitipi Anicinapek Nation's Physical and Cultural Heritage	Change to Governance, Health, Social and Economic Conditions of Apitipi Anicinapek Nation
Past and Present Physical Activities			
Mining	✓	✓	✓
Aggregate Extraction	✓	✓	✓
Community Development	✓	✓	✓
Water Management	✓	✓	✓
Transportation	✓	✓	✓
Power	✓	✓	✓
Energy	✓	✓	✓
Forestry	✓	✓	✓
Agriculture	✓	✓	✓
Recreation	✓	✓	✓
Hunting and Fishing	✓	✓	✓
Future (Reasonably Foreseeable) Projects and Physical Activities			
Mining			
North Timmins Gold Project – Bradshaw Mine	✓	✓	✓
Upper Beaver Gold Project	✓	✓	✓

²⁸ The list of past, present, and future physical activities included in Attachment 29-1 (Project Inclusion List) is based on public information available up to May 21, 2024. The proximity of the physical activities to the Project are identified in Attachment 29-1 (Project Inclusion List).

	Apitipi First Nation Rights and Interests		
	Change to Apitipi Anicinapek Nation’s Indigenous and Treaty Rights	Change in Apitipi Anicinapek Nation’s Physical and Cultural Heritage	Change to Governance, Health, Social and Economic Conditions of Apitipi Anicinapek Nation
Physical Activities with Potential for Cumulative Effects			
ERO: 019-8122 - Permit to take water renewal (Proposal)	✓	✓	✓
Fox Mining Complex Expansion Project – Froome, Stock West, Grey Fox and Fuller Deposits	✓	✓	✓
Other mine-related physical activities (e.g., mineral exploration permits)	✓	✓	✓
Transportation			
Highway 652 Extension to Highway 11	✓	✓	✓
Northlander Passenger Train Expansion of Service	✓	✓	✓
Power			
Little Long Dam Safety Project	✓	✓	✓
Transmission Infrastructure Partnership-1	✓	✓	✓
Wawa to Porcupine Transmission Line	✓	✓	✓
Notes: ✓ = Other physical activities whose residual effects are likely to interact cumulatively with Project residual effects. – = Interactions between the residual effects of other physical activities and residual effects of the project are not expected. The list of past, present and future physical activities (i.e., development applications within regulatory approval processes) is based on public information available up to 2024.			

25.5.2 Change to Apitipi Anicinapek Nation’s Indigenous and Treaty Rights

Various rulings and acts implemented over more than the last 150 years, including European settlement in Canada, and the creation and implementation of Canadian policy and law have transformed the lives of Indigenous Peoples and have shaped Indigenous Peoples’ rights and subsequently resulted in cumulative effects on Apitipi Anicinapek Nation’s exercise of Indigenous and Treaty Rights in the Indigenous Interests RSA (AAN 2024a; IAAC 2024).

Apitipi Anicinapek Nation reported that there are existing stressors on its member’s abilities to hunt and harvest and engage in cultural activities due to the impacts of colonization and development, such as the number of drill sites and access roads in their Traditional Territory (AAN 2024a, b; IAAC 2024). The ability to spend time on the land was reported by Apitipi Anicinapek Nation to be crucial for mental peace and connection to traditions, and the community is concerned that this will become more challenging with an increase in local industry and environmental changes in the region (AAN 2024b). Apitipi Anicinapek Nation expressed concerns regarding the cumulative effects from mining, forestry, hydro power, agriculture (e.g., herbicide spraying), and linear infrastructure on member’s abilities to exercise their

Indigenous and Treaty Rights and continue with their way of life (AAN 2024a, b; IAAC 2024). Apitipi Anicinapek Nation also expressed concern regarding the cumulative effects of declining fish populations, water quality and quantity, and sickness in animals (e.g., moose) on its members abilities to exercise their rights (AAN 2024a, b). Apitipi Anicinapek Nation has observed a correlation between declining moose health and currently active and closed mines in the greater region, such as the Black Fox Mine (McEwan Mining Inc.), Detour Lake Gold Mine (Agnico Eagles Mines Ltd.), Hoyle Pond Mine (Newmount Corp.) and Kidd Creek Mine (Glencore PLC) (AAN 2024b). Furthermore, Apitipi Anicinapek Nation expressed that environmental degradation from mining development and the use of pesticides have made some traditional food sources unsafe to consume, including, but not limited to, moose, caribou and whitefish (AAN 2024b) Apitipi Anicinapek reported these cumulative effects impact the community's diet, health, and ability to engage in cultural practices (AAN 2024b).

25.5.2.1 Cumulative Effect Pathways

As summarized in Table 25.5, past and present physical activities that have been or are being carried out have contributed to the existing conditions for the PA and Indigenous Interests RSA, and the exercise of Apitipi Anicinapek Nation's Indigenous and Treaty Rights. Future physical activities are also anticipated to contribute to the future conditions in the Project assessment areas. Overall, increased mining and other activity (e.g., forestry, agricultural conversion) and the privatization of lands within the PA and Indigenous Interests RSA has altered the current regional areas, contributing to existing cumulative effects on Apitipi Anicinapek Nation's Indigenous and Treaty Rights.

All phases of the Project (construction, operations, decommissioning and closure) have the potential to contribute to cumulative effects on Apitipi Anicinapek Nation's Indigenous and Treaty Rights. Cumulative effects on Apitipi Anicinapek Nation's Indigenous and Treaty Rights could result through the pathways identified in Table 25.1 in Section 25.1.5.

The conclusions in this section are informed by the results of engagement with Apitipi Anicinapek Nation, the literature review, and related biophysical and socio-economic VC assessments presented in the Impact Statement.

25.5.2.2 Mitigation and Enhancement for Cumulative Effects

Mitigation measures to limit residual cumulative effects to Apitipi Anicinapek Nation's Indigenous and Treaty Rights are described in Section 25.4.1.2, Attachment 25.1 and Appendix E (Summary of Project Commitments) of the Impact Statement.

It is expected that proponents of future physical activities that require regulatory approval will develop mitigation measures like those proposed for this Project. Canada Nickel is committed to working with Apitipi Anicinapek Nation to explore opportunities to further mitigate adverse effects to Apitipi Anicinapek Nation's interests and enhance Project benefits. This includes a commitment to working directly with Apitipi Anicinapek Nation to identify opportunities for Apitipi Anicinapek Nation to realize potential benefits

from the Project that can be used to both offset potential adverse effects and create positive effects for the Nation.

25.5.2.3 Cumulative Effects

The analysis in this section includes consideration of the RHO provided in Chapter 29 (Cumulative Effects Assessment) and incorporates the findings of the cumulative effects assessments for VCs found in the Impact Statement that are relevant to Apitipi Anicinapek Nation's Indigenous and Treaty Rights.²⁹

Cumulative effects from past, present and future physical activities in combination with the Project are predicted to adversely affect Apitipi Anicinapek Nation's Indigenous and Treaty Rights. As described in Section 25.5.2, Apitipi Anicinapek Nation indicated that the quality and quantity of harvested wildlife, vegetation, and fish have diminished and that the lands and resources (including surface water and ground water) have been impacted by industrial development in its Traditional Territory.

Existing agricultural conversion, residential development, linear development, mining and forestry activities have affected the quality, quantity or distribution of resources involved in or required for the exercise of Indigenous and Treaty Rights by reducing habitat availability and suitability, increasing mortality risk for culturally important wildlife and fish species, as well as reducing or altering vegetation communities relied upon for Indigenous land and resource use in the Indigenous Interests RSA. The Project occurs in an area that has been altered by ongoing anthropogenic disturbance including forestry, mining, facilities, agriculture and linear development including roads and transmission line corridors.

Residual effects of the Project in combination with effects of future physical activities identified in Table 25.5 may affect access to the resources used or required for the exercise of Indigenous and Treaty Rights within the Indigenous Interest RSA. These proposed developments may result in disturbance to trails and travel ways or impediments to access through fencing or other obstacles within the Indigenous Interest RSA. Short-term sensory disturbances and localized access restrictions associated with the PA and MMB may act cumulatively if they occur concurrently with similar effects arising from the future physical activities listed in Table 25.5.

Changes in the current and future quality, quantity or distribution of resources (including surface water and ground water) involved in or required for the exercise of Indigenous and Treaty Rights have and will arise from residual effects of past, present and future physical activities combined with the predicted residual effects of the Project. While the areas of Crown land to be disturbed by the Project represent a small proportion in the Indigenous Interests RSA and some current use activities could continue to be conducted within the Indigenous Interests RSA, certain practices and related knowledge are often rooted in specific places that have important cultural and spiritual associations that are not readily transferable to other locations. Contribution of the Project to residual cumulative effects on Apitipi Anicinapek Nation's Indigenous and Treaty Rights in the Indigenous Interests RSA are likely to occur and are predicted to be

²⁹ These include the following sections of Chapter 29: Section 29.2 Regional Historical Overview, Section 29.6 Atmospheric Environment, Section 29.7 Acoustic Environment, Section 29.8 Groundwater, Section 29.9 Surface Water, Section 29.10 Vegetation, Riparian and Wetland Environments, Section 29.11 Fish and Fish Habitat, Section 29.12 Bird and Bird Habitat, Section 29.13 Wildlife and Wildlife Habitat, Section 29.14 Climate Change, Section 29.15 Health, Section 29.16 Social Conditions, and Section 29.17 Economic Conditions.

adverse, moderate in magnitude and long-term in duration, which reflects the ongoing nature of disturbance that has been and continues to occur in the area because of agriculture, forestry and industrial development, but are ultimately reversible.

The contribution of the Project to residual cumulative effects on Apitipi Anicinapek Nation's Indigenous and Treaty Rights in the Indigenous Interests RSA are predicted to be adverse, moderate in magnitude and long-term in duration, which reflects the ongoing nature of disturbance that has been and continues to occur in the area because of agriculture, forestry and industrial development, but are largely reversible. However, following engagement with Apitipi Anicinapek Nation, Canada Nickel understands that residual effects of past, present, and future physical activities combined with the predicted residual effects of the Project are anticipated to be irreversible for members of the Apitipi Anicinapek Nation who have already experienced alienation and dispossession from harvesting areas within the Indigenous Interests RSA and in the vicinity of the PA and MMB, as these experiences are likely to increase in the future rather than decrease and require regional initiatives and programs to be addressed. The contribution of the Project to residual cumulative effects on Apitipi Anicinapek Nation's Indigenous and Treaty Rights is expected to be moderate, because the area to be disturbed in native vegetation represents a small proportion of native vegetation in the Indigenous Interests RSA, the Project is largely on private lands, and the PA will be reclaimed and revegetated throughout the operations phase and following decommissioning and closure. Overall, direct loss of habitat and riparian communities and wetland areas within the PA will be offset in part by reclamation and revegetation activities after the operations phase is complete, and this will involve engagement with Indigenous Nations as described in Sections 25.5.2.2 and 25.8.

As such, no additional mitigation measures are proposed for incremental Project contributions to the cumulative effects on the related VCs or on Apitipi Anicinapek Nation's Indigenous and Treaty Rights.

25.5.3 Change in Apitipi Anicinapek Nation's Physical and Cultural Heritage

As described in Section 25.5.2, various rulings, acts, policies, laws and European settlement in Canada implemented over more than the last 150 years have transformed the lives of Indigenous Peoples and have shaped Indigenous Peoples' rights. These changes have subsequently resulted in cumulative effects on Apitipi Anicinapek Nation's Physical and Cultural Heritage (AAN 2024a; IAAC 2024).

Apitipi Anicinapek Nation emphasized the importance of maintaining and protecting its customs, protocols, culture, traditions, and land uses (AAN 2023b, 2024a, b; IAAC 2023d, 2024). These include culturally and historically significant sites and sacred places such as Lake Abitibi, archaeological heritage, burials and cemeteries, and significant landforms; as well as habitation sites such as cabins and overnight campsites; hunting, trapping, fishing and plant harvesting areas; and trails and travel routes that provide access to important places within Apitipi Anicinapek Nation's Traditional Territory (AAN 2023b, 2024a; IAAC 2023d).

Apitipi Anicinapek Nation reported that cumulative effects from mining development have led to extensive environmental degradation including erosion, pollution, reduced bushland, increased roads, clear-cutting and the alteration of natural landscapes (AAN 2024b). Apitipi Anicinapek Nation members explained that several pristine environments have also been adversely affected by sensory disturbances and access restrictions, reducing members ability to enjoy the limited cultural heritage locations that are left (AAN 2024b). Maintaining a connection to the land is crucial to many Apitipi Anicinapek Nation members who reported that preserving the remaining undisturbed areas is important for the community's cultural heritage and for use by future generations (AAN 2024b).

25.5.3.1 Cumulative Effect Pathways

As summarized in Section 25.5.2.3, past and present physical activities that have been or are being carried out have contributed to the existing conditions for the PA and Indigenous Interests RSA, and Apitipi Anicinapek Nation's Physical and Cultural Heritage. Future physical activities are also anticipated to contribute to the future conditions in the Project assessment areas. Overall, increased mining and other activities (e.g., forestry, agricultural conversion) and the privatization of lands within the PA and Indigenous Interests RSA has altered the current regional areas, contributing to existing cumulative effects on Apitipi Anicinapek Nation's Physical and Cultural Heritage.

All phases of the Project (construction, operations, decommissioning and closure) have the potential to contribute to cumulative effects on Apitipi Anicinapek Nation's Physical and Cultural Heritage. Cumulative effects on Apitipi Anicinapek Nation's Physical and Cultural Heritage could result through the pathways identified in Table 25.1 in Section 25.1.5.

The conclusions in this section are informed by the results of engagement with Apitipi Anicinapek Nation, the literature review, and related biophysical VC assessments presented in the Impact Statement.

25.5.3.2 Mitigation and Enhancement for Cumulative Effects

Mitigation measures to limit residual cumulative effects to Apitipi Anicinapek Nation's Physical and Cultural Heritage are described in Section 25.4.2.2, Attachment 25.1 and Appendix E (Summary of Project Commitments) of the Impact Statement.

25.5.3.3 Cumulative Effects

The analysis in this section includes consideration of the RHO provided in Chapter 29 (Cumulative Effects Assessment) and incorporates the findings of the cumulative effects assessments for VCs found in the Impact Statement that are relevant to Apitipi Anicinapek Nation's Physical and Cultural Heritage.³⁰

³⁰ These include the following sections of Chapter 29: Section 29.2 Regional Historical Overview, Section 29.4 Geology and Geologic Hazards, Section 29.5 Soil, Section 29.6 Atmospheric Environment, Section 29.7 Acoustic Environment, Section 29.8 Groundwater, Section 29.9 Surface Water, and Section 29.15 Health.

Cumulative effects from past, present and future physical activities in combination with the Project are predicted to adversely affect Apitipi Anicinapek Nation's Physical and Cultural Heritage. The increased mining and other activities (e.g., forestry, agricultural conversion) and the privatization of lands within the PA and Indigenous Interests RSA has altered the current regional areas, contributing to existing cumulative effects on Apitipi Anicinapek Nation's Physical and Cultural Heritage.

Existing agricultural conversion, residential development, linear development, mining and forestry activities have resulted in the loss or alternation of use, access, value, quality of experience and required condition of Apitipi Anicinapek Nations physical or cultural heritage sites in the Indigenous Interests RSA. The Project occurs in an area that has been altered by ongoing anthropogenic disturbance including mining, forestry, linear development including roads and transmission line corridors.

Residual effects of the Project in combination with effects of future physical activities identified in Table 25.5 may affect Apitipi Anicinapek Nations physical or cultural heritage. These proposed developments may result in sensory disturbances and changes in air quality within the Indigenous Interest RSA where traditional important areas are present. Short-term sensory disturbances and localized access restrictions associated with the PA and MMB may act cumulatively if they occur concurrently with similar effects arising from the future physical activities listed in Table 25.5.

As described in Section 25.5.2.3, residual cumulative effects are anticipated on access, necessary conditions, and the current use of lands and resources for traditional purposes (e.g., change in quality, quantity or distribution of resources and/or their habitats; change in access) within the PA and Indigenous Interest RSA, and these changes will result in residual cumulative effects on Apitipi Anicinapek Nation's Physical and Cultural Heritage. If Apitipi Anicinapek Nation experiences changes in necessary conditions at its physical and cultural heritage sites in the Indigenous Interests RSA, the Nation may also experience loss or alteration of the ability to share knowledge and history with current and future generations.

Changes in the current and future access, terrain stability, and effects to archaeological and heritage resources involved in or required for the exercise of Physical and Cultural Heritage have and will arise from residual effects of past, present, and future physical activities combined with the predicted residual effects of the Project. While the areas of Crown land to be disturbed represent a small proportion in the Indigenous Interests RSA and some current use activities could continue to be conducted within the Indigenous Interests RSA, certain practices and related knowledge are often rooted in specific places that have important cultural and spiritual associations that are not readily transferable to other locations.

The contribution of the Project to residual cumulative effects on Apitipi Anicinapek Nation's Physical and Cultural Heritage in the Indigenous Interests RSA are anticipated to be adverse and low in magnitude, long-term in duration during all Project phases, but are largely reversible. However, following engagement with Apitipi Anicinapek Nation, Canada Nickel understands that residual effects of past, present, and reasonably foreseeable future projects and physical activities combined with the predicted residual effects of the Project are anticipated to be irreversible for members of Apitipi Anicinapek Nation who have already experienced alienation and dispossession from physical and cultural heritage sites within the Indigenous Interests RSA and in the vicinity of the PA and MMB, as these experiences are likely to increase in the future rather than decrease and require regional initiatives and programs to be addressed. The contribution of the Project to residual cumulative effects on Apitipi Anicinapek Nation's Physical and

Cultural Heritage is expected to be low because sensory effects will be short-term and localized and the area to be disturbed represents a small proportion of Crown land in the Indigenous Interests RSA. Overall, direct loss of habitat and riparian communities and wetland areas within the PA that may be connected to physical and cultural heritage will be offset in part by reclamation and revegetation activities after the operations phase is complete, and this will involve engagement with Apitipi Anicinapek Nation as described in Sections 25.5.2.2 and 25.8.

As such, no additional mitigation measures are proposed for incremental Project contributions to the cumulative effects on the related VCs or on Apitipi Anicinapek Nation's Physical and Cultural Heritage.

25.5.4 Change to Governance, Health, Social and Economic Conditions of Apitipi Anicinapek Nation

As described in Section 25.5.2, various rulings, acts, policies, laws and European settlement in Canada implemented over more than the last 150 years have transformed the lives of Indigenous Peoples and have shaped Indigenous Peoples' rights. These changes have subsequently resulted in cumulative effects on Apitipi Anicinapek Nation's Governance, Health, Social and Economic Conditions (AAN 2024a; IAAC 2024).

Apitipi Anicinapek Nation stated that it has used the lands within its Traditional Territory since time immemorial and its members depend on a deep connection with their land to support their spiritual, cultural and economic life. Apitipi Anicinapek Nation emphasized the importance of maintaining and protecting the wellbeing and safety of its community (AAN 2022, 2023b, c, 2024a, b; IAAC 2023d, 2024). Apitipi Anicinapek Nation reported that cumulative impacts from mining development have led some country foods to become unsafe to consume (AAN 2024b). These conditions affect both the physical and mental health of community members (AAN 2024b). In addition, intergenerational trauma related to colonization, residential schools and the 60s scoop have contributed to mental health concerns and drug and alcohol abuse (AAN 2024b). Apitipi Anicinapek Nation added that these issues are exacerbated by insufficient access to specialized healthcare facilities and resources in the community (AAN 2024b).

Apitipi Anicinapek Nation stated that funding from mining development in Treaty 9 Territory has resulted in more off-reserve job opportunities with higher pay and specialized training in the mining industry for community members, as well as improvements to on-reserve housing and community services, due to the establishment of Impact Benefit Agreements (AAN 2024b). However, gaps in specialized training, a sufficient power system, and other concerns regarding community infrastructure and services still persist (AAN 2024b). As a result, Apitipi Anicinapek Nation is hopeful that Canada Nickel will provide financial contributions and establish an Impact Benefit Agreement with the Nation to support further economic opportunities for job creation, skills development, revenue-sharing, and the development of community infrastructure and services (AAN 2024b).

25.5.4.1 Cumulative Effect Pathways

As summarized in Table 25.5, past and present physical activities that have been or are being carried out have contributed to the existing conditions for the PA and Indigenous Interests RSA, and Apitipi Anicinapek Nation's Governance, Health, Social and Economic Conditions. Future physical activities are also anticipated to contribute to the future conditions in the Project assessment areas. Overall, increased mining and other activities (e.g., forestry, agricultural conversion) and the privatization of lands within the PA and Indigenous Interests RSA has altered the current regional areas, contributing to existing cumulative effects on Apitipi Anicinapek Nation's Governance, Health, Social and Economic Conditions.

All phases of the Project (construction, operations, decommissioning and closure) have the potential to contribute to cumulative effects on Apitipi Anicinapek Nation's Governance, Health, Social and Economic Conditions. Cumulative effects on Apitipi Anicinapek Nation's Governance, Health, Social and Economic Conditions could result through the pathways identified in Table 25.1 in Section 25.1.5.

The conclusions in this section are informed by the results of engagement with Apitipi Anicinapek Nation, the literature review, and related biophysical and socio-economic VC assessments presented in the Impact Statement.

25.5.4.2 Mitigation and Enhancement for Cumulative Effects

Mitigation measures to limit residual cumulative effects to Apitipi Anicinapek Nation's Governance, Health, Social and Economic Conditions are described in Section 25.4.3.2, Attachment 25.1 and Appendix E (Summary of Project Commitments) of the Impact Statement.

25.5.4.3 Cumulative Effects

The analysis in this section includes consideration of the RHO provided in Chapter 29 (Cumulative Effects Assessment) and incorporates the findings of the cumulative effects assessment for VCs found in the Impact Statement that are relevant to Apitipi Anicinapek Nation's Governance, Health, Social and Economic Conditions.³¹

Cumulative effects from past, present and future physical activities in combination with the Project are predicted to adversely affect Apitipi Anicinapek Nation's Governance, Health, Social and Economic Conditions. As described in Section 25.5.4, increased development in the Indigenous Interests RSA has altered Apitipi Anicinapek Nation's connection to the land and ability for its members to maintain their spiritual, cultural, and economic life. These include changes related to subsistence-based livelihood, access to key sites, decision-making abilities regarding land and water, and ability to uphold cultural traditions, laws, and governance systems that inform how rights are exercised within the Indigenous Interest RSA. Increased development in regional business in the Indigenous Interest RSA and associated

³¹ These include the following sections of Chapter 29: Section 29.2 Regional Historical Overview, Section 29.4 Geology and Geologic Hazards, Section 29.5 Soil, Section 29.6 Atmospheric Environment, Section 29.7 Acoustic Environment, Section 29.8 Groundwater, Section 29.9 Surface Water, Section 29.10 Vegetation, Riparian and Wetland Environments, Section 29.11 Fish and Fish Habitat, Section 29.12 Bird and Bird Habitat, Section 29.13 Wildlife and Wildlife Habitat, Section 29.14 Climate Change, Section 29.15 Health, Section 29.16 Social Conditions, and Section 29.17 Economic Conditions.

demand on infrastructure, services, accommodation and transportation has also contributed to existing cumulative effects on Apitipi Anicinapek Nation's Governance, Health, Social and Economic Conditions.

The general presence of the Project and its workforce within the PA and Indigenous Interest RSA, may result in reduced decision-making, interference, community concerns, and safety constraints on the land, which may affect Apitipi Anicinapek Nation's Governance, Health, Social and Economic Conditions. It may also affect the Nation's harvest and consumption of terrestrial resources, quality of fishing, hunting, plant harvesting and cultural sites, trade and traditional journey routes, the transmission of cultural knowledge, the strengthening of family ties, and tourism, all of which are connected to Apitipi Anicinapek Nation's Governance, Health, Social and Economic Conditions.

As described in Section 25.2.4, Apitipi Anicinapek Nation emphasized the importance of maintaining or improving the ability of members to earn a living and to increase economic benefits. The Project is anticipated to result in both positive and adverse effects on Indigenous employment. It is assumed that the Project will increase employment opportunities for Indigenous individuals resulting in increased income levels and provide valuable employment experience.

The contribution of the Project to residual cumulative effects on Apitipi Anicinapek Nation's Governance, Health, Social and Economic Conditions in the Indigenous Interests RSA are predicted to be both positive (low in magnitude) and adverse (moderate in magnitude). Both positive and adverse residual cumulative effects are long-term in duration and largely reversible. Positive effects of the training and employment experience that may be acquired by the Nation's member through employment on the Project could be leveraged in pursuit of future employment and career opportunities in the region. However, following engagement with Apitipi Anicinapek Nation, Canada Nickel understands that residual effects of past, present, and reasonably foreseeable future projects and physical activities combined with the predicted residual effects of the Project are anticipated to be irreversible for Apitipi Anicinapek Nation's decision-making in the PA and MMB, and for Nation members who have already experienced alienation and dispossession from harvesting areas or physical or cultural heritage sites within the Indigenous Interests RSA and in the vicinity of the PA and MMB, as these experiences are likely to increase in the future rather than decrease and require regional initiatives and programs to be addressed. The contribution of the Project to residual cumulative effects on Apitipi Anicinapek Nation's Governance, Health, Social and Economic Conditions is expected to be low to moderate because positive effects (direct, indirect, and induced) of the Project are expected to be unevenly distributed, the areas of Crown land to be disturbed represent a small proportion in the Indigenous Interests RSA and current use activities associated with the Nation's governance, health, social and economic conditions could continue to be conducted within the Indigenous Interests RSA.

Overall, direct loss of habitat and riparian communities and wetland areas and decision-making ability within the PA will be offset in part through engagement with Indigenous Nations as described in Sections 25.5.4.2 and 25.8.

As such, no additional mitigation measures are proposed for incremental Project contributions to the cumulative effects on the related VCs or on Apitipi Anicinapek Nation's Governance, Health, Social, and Economic Conditions.

25.5.5 Cumulative Effects Without the Project

As described in Sections 25.5.2 to 25.4.3, various rulings and acts implemented over more than the last 150 years, including European settlement in Canada, and the creation and implementation of Canadian policy and law, have resulted in cumulative effects on Apitipi Anicinapek Nation's interests within the Indigenous Interests RSA (AAN 2024a; IAAC 2024). Past and present anthropogenic disturbance within the Indigenous Interests RSA (e.g., mining, aggregate extraction, water management, transportation, power, energy, and forestry), as well as land use by non-Indigenous Peoples (e.g., recreation, hunting, fishing), have also resulted in cumulative effects on Apitipi Anicinapek Nation's interests. Examples of residual cumulative effects from past and present projects include changes in the quality, quantity, and distribution of resources harvested and consumed by Apitipi Anicinapek Nation, as well as changes to the use of lands for traditional purposes, changes in access and travel (inclusive of historic and preferred land and/or water-based routes), and changes to cultural practices and the transfer of knowledge. Such effects that have occurred in the region due to ongoing anthropogenic disturbance and non-Indigenous land use are likely to continue to occur in the future if the Project does not proceed.

It is reasonable to assume that mineral exploration in the region will continue to occur in the future whether the Project occurs or not. The same can be assumed of other industries and non-Indigenous uses in the region. As demonstrated on Figure 29.1 of Chapter 29, past and present projects and physical activities are largely concentrated along existing transportation corridors (e.g., highways, railways) in the region and it is likely that areas in proximity to existing transportation and other infrastructure continue to be potential areas for future developments.³² Without the Project, future regional cumulative effects to bio-physical and socio-economic VCs considered in the Impact Statement are therefore predicted to be the same as those identified if the proposed Project proceeds. For example, without the Project, surface water quality and quantity within the Indigenous Interests RSA is likely to continue to be influenced by past and present projects and is also likely to be influenced by reasonably foreseeable projects such as mineral exploration or mining developments. However, these projects would be expected to implement mitigation measures to, for example, protect water quality and quantity, similar to those proposed for the Project, and any changes to water quality or quantity from other projects would likely be limited to a localized area downstream of the future exploration site or mine. In consideration of other examples, such as cumulative effects on harvested resources and/or culturally important species (e.g., fish, wildlife), reasonably foreseeable mineral exploration activities would require provincial permitting and/or an environmental impact assessment if the future projects proceed to regulatory review. These processes would require the future proponents to go through an assessment process to identify potential effects to fish and wildlife, and to identify and implement appropriate mitigation or offset measures through engagement with Indigenous Nations, as has been required for the proposed Project.

In consideration of the history and predicted trajectory of anthropogenic disturbance and land use in the Indigenous Interests RSA, cumulative effects on Apitipi Anicinapek Nation's interests described in Sections 25.5.2 to 25.4.3 are predicted to occur with or without the implementation of the Project.

³² See Figure 29.1 of Chapter 29 (Cumulative Effects Assessments).

25.5.6 Summary of Cumulative Effects

Table 25.6 summarizes cumulative effects on Apitipi Anicinapek Nation's rights and interests. The assessment of disproportionately distributed residual cumulative effects on Apitipi Anicinapek Nation's rights and interests is provided in Section 25.5.6.1.

Table 25.6 Residual Cumulative Effects

Residual Cumulative Effect	Residual Cumulative Effects Characterization						
	Direction	Magnitude	Geographic Extent	Timing	Duration	Frequency	Reversibility
Change to Apitipi Anicinapek Nation's Indigenous and Treaty Rights							
With the Project	A	M	PA/ RSA	A	LT	MIR/MRE	R/IR
Without the Project	A	L/M	PA/RSA	A	LT	MIR/MRE	R/IR
Contribution from the Project to the Residual Cumulative Effect	The Project may result in the direct loss or alteration of native vegetation, bird, wildlife, and fish habitats that are connected to the exercise or practice of Indigenous and Treaty Rights. The Project may also result in indirect effects from sensory disturbance that may further alter the abundance and distribution of harvested resources and/or the necessary conditions for the exercise or practice of Indigenous or Treaty rights. Access routes and ability to travel to or through preferred use areas/sites of interest that overlap with accessible Crown lands within the PA will be altered through access restrictions, however, the Project is not expected to create a change or disruption that widely reduces or restricts the current use of lands and resources for traditional purposes, including the Nation's ability to access culturally important sites or features (e.g., hunting sites, fishing sites) within the Indigenous Interests RSA or its broader Traditional Territory. While the areas of Crown land to be disturbed represent a small proportion in the Indigenous Interests RSA and some current use activities could continue to be conducted within the Indigenous Interests RSA, certain practices and related knowledge are often rooted in specific places that have important cultural and spiritual associations that are not readily transferable to other locations. With mitigation, the contribution of the Project to residual cumulative effects to Apitipi Anicinapek Nation's Indigenous and Treaty Rights is expected to be moderate and long-term in duration, which reflects the ongoing nature of disturbance that has been and continues to occur in the area because of agriculture, forestry and industrial development, are largely reversible. However, residual effects of past, present future physical activities combined with the predicted residual effects of the Project are anticipated to be irreversible for members of the Apitipi Anicinapek Nation who have already experienced alienation and dispossession from harvesting areas within the Indigenous Interests RSA and in the vicinity of the PA and MMB, as these experiences are likely to increase in the future rather than decrease and require regional initiatives and programs to be addressed Overall, direct loss of habitat and riparian communities and wetland areas within the PA will be offset in part by reclamation and revegetation activities after the operations phase is complete, and this will involve engagement with Indigenous Nations as described in Sections 25.5.2.2 and 25.8.						

Residual Cumulative Effect	Residual Cumulative Effects Characterization						
	Direction	Magnitude	Geographic Extent	Timing	Duration	Frequency	Reversibility
Change in Apitipi Anicinapek Nation's Physical and Cultural Heritage							
With the Project	A	L	PA/RSA	A	LT	MIR/MRE	R/IR
Without the Project	A	L	PA/RSA	A	LT	MIR/MRE	R/IR
Contribution from the Project to the Residual Cumulative Effect	<p>The Project will result in changes in access and access conditions required for its Physical and Cultural Heritage sites through direct loss or alteration of trails and travel ways, restrictions on the ability to travel to and through preferred areas that overlap with the PA, or through indirect effects of sensory disturbance in the vicinity of the PA. The contribution of the Project to residual cumulative effects on Apitipi Anicinapek Nation's Physical and Cultural Heritage is expected to be low because sensory effects will be short-term and localized and the area to be disturbed represents a small proportion of Crown land in the Indigenous Interests RSA and effects are largely reversible. However, residual effects of past, present and future physical activities combined with the predicted residual effects of the Project are anticipated to be irreversible for members of Apitipi Anicinapek Nation who have already experienced alienation and dispossession from Physical and cultural heritage sites within the Indigenous Interests RSA and in the vicinity of the PA and MMB, as these experiences are likely to increase in the future rather than decrease and require regional initiatives and programs to be addressed. Overall, direct loss of habitat and riparian communities and wetland areas within the PA that may be connected to physical and cultural heritage will be offset in part by reclamation and revegetation activities after the operations phase is complete, and this will involve engagement with Indigenous Nations as described in Sections 25.5.3.2 and 25.8.</p>						
Change to Governance, Health, Social and Economic Conditions of Apitipi Anicinapek Nation							
With the Project	A/P	L/M	PA/RSA	A	LT	MIR/MRE	R/IR
Without the Project	A	L/M	PA/RSA	A	LT	MIR/MRE	R/IR
Contribution from the Project to the Residual Cumulative Effect	<p>The Project may result in changes to Apitipi Anicinapek Nation's Governance, Health, Social and Economic Conditions that inform the way Indigenous and Treaty Rights are exercised because of reduced access and decision-making abilities, and associated effects. The Project's contribution to residual cumulative effects to Apitipi Anicinapek Nation's Governance, Health, Social and Economic Conditions in the Indigenous Interests RSA are predicted to be both positive (low in magnitude) and adverse (moderate in magnitude). Both positive and adverse residual cumulative effects are long-term in duration and largely reversible. The positive effects of the training and employment experience that may be acquired by Nation members through employment on the Project could be leveraged in pursuit of future employment and career opportunities in the region. However, residual effects of past, present and future physical activities combined with the predicted residual effects of the Project are anticipated to be irreversible for Apitipi Anicinapek Nation's decision-making in the PA and MMB, and for Nation members who have already experienced alienation and dispossession from harvesting areas or physical or cultural heritage sites within the Indigenous Interests RSA and in the vicinity of the PA and MMB, as these experiences are likely to increase in the future rather than decrease and require regional initiatives and programs to be addressed. The contribution of the Project to residual cumulative effects on Apitipi Anicinapek Nation's Governance, Health, Social and Economic Conditions is expected to be low to moderate because positive effects (direct, indirect, and induced) of the Project are expected to be unevenly distributed, the areas of Crown land to be disturbed represent a small proportion in the Indigenous Interests RSA and current use activities associated with the Nation's governance, health, social and economic conditions could continue to be conducted within the Indigenous Interests RSA. Overall, direct loss of habitat and riparian communities and wetland areas and decision-making ability within the PA will be offset in part through engagement with Indigenous Nations as described in Sections 25.5.4.2 and 25.8 and through reclamation and revegetation activities after the operations phase is complete.</p>						

Residual Cumulative Effect	Residual Cumulative Effects Characterization						
	Direction	Magnitude	Geographic Extent	Timing	Duration	Frequency	Reversibility
<p>KEY:</p> <p>See Table 25.2 for detailed definitions</p> <p>Project Phase: <i>C: Construction</i> <i>O: Operations</i> <i>D: Decommissioning and closure</i></p> <p>Direction: <i>P: Positive</i> <i>A: Adverse</i> <i>N: Neutral</i></p> <p>Magnitude: <i>N: Negligible</i> <i>L: Low</i> <i>M: Moderate</i> <i>H: High</i></p> <p>Geographic Extent: <i>PA: Project Area</i> <i>LSA: Local Study Area</i> <i>RSA: Regional Study Area</i></p> <p>Timing: <i>NA: Not Applicable</i> <i>A: Applicable</i></p> <p>Duration: <i>ST: Short-term</i> <i>MT: Medium-term</i> <i>LT: Long-term</i></p> <p>Frequency: <i>S: Single event</i> <i>MIR: Multiple Irregular event</i> <i>MRE: Multiple Regular event</i> <i>C: Continuous</i></p> <p>Reversibility: <i>R: Reversible</i> <i>IR: Irreversible</i></p>							

25.5.6.1 Disproportionately Distributed Residual Cumulative Effects on Apitipi Anicinapek Nation Subgroups

Project activities in combination with activities associated with past/present and reasonably foreseeable projects are anticipated to result in the same disproportionately distributed effects on Apitipi Anicinapek Nation subgroups as those identified in Section 25.4.4.3. Disproportionately distributed cumulative effects on Apitipi Anicinapek Nation subgroups extend into the Indigenous Interests RSA and may also be experienced in the vicinity of the PA and MMB.³³

25.6 Extent of Significance and Prediction Confidence

As described in Section 25.1.10, adverse federal effects considered in the assessment include:

- an impact – occurring in Canada and resulting from any change to the environment – to Indigenous Peoples, such as to physical and cultural heritage, the current use of lands and resources for traditional purposes or any structure, site or thing that is of historical, archaeological, paleontological or architectural significance

³³ Disproportionately distributed cumulative effects are also predicted for Health (Chapter 21), Social Conditions (Chapter 22), and Economic Conditions (Chapter 23).

- any change occurring in Canada to the health, social or economic conditions of Indigenous Peoples

The characterization of the extent of significance of adverse federal effects (i.e., the severity of the impacts) has been conservatively overestimated with consideration of any combination of the effect characterization attributes most applicable to one or more adverse federal effect, the concerns raised and status of the concerns, and the perspectives of Apitipi Anicinapek Nation regarding its preferred conditions or thresholds regarding the extent of significance of adverse federal effects.

Various rulings and acts implemented over more than the last 150 years, including European settlement in Canada, and the creation and implementation of Canadian policy and law have transformed the lives of Indigenous Peoples and have shaped Indigenous Peoples' rights and subsequently resulted in cumulative effects on Apitipi Anicinapek Nation's exercise of Indigenous and Treaty Rights in the Indigenous Interests LSA and RSA. Existing agricultural conversion, residential development, linear development, mining and forestry activities have affected the quality, quantity or distribution of resources involved in or required for the exercise of Indigenous and Treaty Rights by reducing habitat availability and suitability, increasing mortality risk for culturally important wildlife and fish species, as well as reducing or altering vegetation communities relied upon for Indigenous land and resource use in the Indigenous Interest LSA and RSA. The Project occurs in an area that has been altered by ongoing anthropogenic disturbance including forestry, mining, facilities, agriculture and linear development including roads and transmission line corridors

As described in Sections 25.4 and 25.5, Apitipi Anicinapek Nation access routes and ability to travel to or through preferred use areas/sites of interest that overlap with accessible Crown lands within the PA and/or the MMB will be altered through access restrictions and changes in necessary conditions.

Residual effects of the Project in combination with effects of future physical activities identified in Table 25.5 may result in disturbance to trails and travel ways or impediments to access through fencing or other obstacles within the Indigenous Interests RSA. However, site access and continued engagement are key elements considered in the Impact Benefit Agreement under negotiation with Apitipi Anicinapek Nation and will include the conditions for Indigenous Nations to access select areas of the PA and MMB for the exercise of Indigenous and Treaty Rights, acknowledging that, for safety and operational reasons, it may be necessary for Canada Nickel to restrict access to certain lands and/or activities within the PA and MMB.

Indigenous health conditions may be affected through changes to the availability of wildlife, fish, and plants that are harvested for country foods and the perceived quality of country foods in the PA, MMB and Indigenous Interests LSA and RSA, as assessed in Sections 25.4.1.3 and 25.5.2.3. The Project is expected to remove vegetation and wetland areas during construction activities that may be used as country food or for medicinal purposes by Indigenous Nations. Development of the PA will also remove habitat suitable for wildlife, vegetation or fish species harvested for consumption. Project-related transportation may cause wildlife mortality and reduce the availability of traditionally harvested resources in the Indigenous Interests LSA and RSA. Project-related noise, light and vibration may also alter the availability of traditional resources in these areas.

Actual or perceived changes in food quality and aesthetics in the MMB and the Indigenous Interests LSA and RSA could lead to changes in the way Apitipi Anicinapek Nation members harvest or eat traditional foods and therefore alter food security, which could lead to physical health changes. However, the Project is not expected to create a change or disruption that widely reduces or restricts Apitipi Anicinapek Nation current use of lands and resources for traditional purposes, including the Nation's ability to access culturally important sites or features (e.g., hunting sites, fishing sites, physical and cultural heritage sites) within the Indigenous Interests LSA and RSA or within its broader Traditional Territory.

Changes to the current use of lands and resources for traditional purposes within the Indigenous Interests LSA and RSA are anticipated to be negligible, while changes to the current use of lands and resources for traditional purposes within the PA and MMB are predicted to be adverse, moderate in magnitude, short term during the construction and decommissioning and closures phases and occur with multiple irregular frequency, and medium term during the operation phase, occurring with multiple regular frequency. Adverse federal effects are considered largely reversible during all Project phases as they are primarily tied to Project activities (e.g., restricted/controlled access; clearing and grading; construction and operational noise and vibration; open pit dewatering) and it is anticipated that the PA, MMB, and Indigenous Interests LSA will return to current conditions once the open pit refills and Project activities, inclusive of progressive reclamation and revegetation activities, cease. However, residual effects of past, present, and future physical activities combined with the predicted residual effects of the Project are anticipated to be irreversible for members of Apitipi Anicinapek Nation who have already experienced alienation and dispossession from harvesting areas within the Indigenous Interests LSA and RSA and in the vicinity of the PA and MMB, as these experiences are likely to increase in the future rather than decrease and require regional initiatives and programs to be addressed.

Changes to any structure, site or thing that is of historical, archaeological, paleontological or architectural significance are not anticipated within the PA as no historical, archaeological, paleontological, or architecturally significant sites have been identified within the PA to date (Appendix B.11 Stage 1 AA). Additionally, the Stage 2 AA will determine the presence or absence of these features prior to construction, and any sites (if present), will be subject to the requirements of the MCM (Ontario Ministry of Tourism and Culture 2011) and the Archaeological Resources Protection Plan. With the implementation of mitigation measures to offset the loss of information resulting from site alteration (if present), no adverse residual effects to historical, archaeological, paleontological, or architecturally significant sites are anticipated. Adverse residual effects are however predicted for Apitipi Anicinapek Nation intangible physical and cultural heritage (e.g., storied places; named places; sacred sites) if present within or in proximity to the PA and MMB due to the predicted alterations in access and necessary conditions described above. However, while the areas of Crown land to be disturbed within the PA and MMB represent a small proportion in the Indigenous Interests LSA and RSA and some current use activities could continue to be conducted within the Indigenous Interests LSA and RSA, certain practices and related knowledge are often rooted in specific places that have important cultural and spiritual associations that are not readily transferable to other locations.

Changes to demand on services and infrastructure, accommodation availability, and transportation infrastructure are expected to occur within the Indigenous Interests LSA and the Social Conditions LSA (e.g., the City of Timmins and the Towns of Cochrane, Iroquois Falls, and Smooth Rock Falls) throughout construction and operations and will be largely reversible following the decommissioning and closure phase. Changes to Indigenous employment, business, and economy are anticipated both on and off reserve during all Project phases. Adverse effects on regional business (including Indigenous businesses) are predicted due to Project wages being greater than existing conditions, albeit consistent with wages in the mining industry, and due to the potential for Project employment to be deemed more desirable than other forms of employment in the Indigenous Interest LSA.

Adverse residual effects on the Health, Social and Economic Conditions of Apitipi Anicinapek Nation are anticipated to be low in magnitude within the PA, MMB and the Indigenous Interests LSA during all Project phases, inclusive of timing considerations due to the seasonal nature of certain cultural practices that are connected to health, social and economic conditions. Residual effects are short-term during the Construction and Decommissioning and Closure Phases and will occur as multiple irregular events. Residual effects are medium-term during the Operation Phase and will occur as multiple regular events. However, residual effects are considered largely reversible during all phases as they are primarily tied to Project activities (e.g., restricted/controlled access; presence of Project workforce; duration of contract/employment) and it is anticipated that the PA, MMB, and Indigenous Interests LSA will return to current conditions once Project activities, inclusive of progressive reclamation and revegetation, cease. However, residual effects of past, present, and future physical activities combined with the predicted residual effects of the Project are anticipated to be irreversible for Apitipi Anicinapek Nation's decision-making in the PA and MMB, and for Nation members who have already experienced alienation and dispossession from harvesting areas or physical or cultural heritage sites within the Indigenous Interests RSA and in the vicinity of the PA and MMB, as these experiences are likely to increase in the future rather than decrease and require regional initiatives and programs to be addressed.

In consideration of Project design, specific mitigation, enhancement and restoration measures, Impact Benefit Agreement measures, and commitments to engage with interested Indigenous Nations throughout the Project's lifespan, the predicted extent of significance of adverse federal effects is low to moderate.

The prediction confidence in the conclusions for Project residual effects and residual cumulative effects for Apitipi Anicinapek Nation's interests is moderate and is based on available information and feedback provided by Apitipi Anicinapek Nation; the suite of mitigation measures and management plans proposed in Attachment 25.1 and Appendix E (Summary of Project Commitments) of the Impact Statement; Canada Nickel's understanding that Apitipi Anicinapek Nation's interests occur on lands and waters within the Project assessment areas that overlap with the Apitipi Anicinapek Nation's Traditional Territory; and assumptions described in Section 25.7.

25.7 Assumptions

Canada Nickel understands that Apitipi Anicinapek Nation holds claim to asserted and/or established Indigenous and Treaty Rights in the area of the Project. By adopting a recognition-based approach informed by the regulatory and policy setting described in Section 25.1.1, this assessment included consideration for all effects to interests or matters of importance identified by Apitipi Anicinapek Nation.

Conservative assumptions regarding the Project were also made for VCs related to Apitipi Anicinapek Nation's interests, as described throughout the Impact Statement, to overestimate the effects assessed.

Patented (private) land data was limited to the use of mining land tenure and non-mining tenure as a private land proxy approximation. Limitations for the land and resource use analysis includes that of Crown land ownership (e.g. lack of property identifiers). Unpatented Crown land is assumed to be Crown land after patent land, Indigenous reserves, provincial parks, and conservation reserves are removed, and is an estimate only as a separate Crown land data set is unavailable. Certain other data, such as confidential identifier information (e.g., permit holders, licence holders) were not readily available for inclusion due to privacy and/or publication limitations.

25.8 Follow-up and Monitoring

Canada Nickel is committed to achieving its sustainability principles and objectives.³⁴ Canada Nickel's follow-up programs that relate to Apitipi Anicinapek Nation's interests will be prepared and implemented to monitor environmental protection and follow-up requirements for the Project and to identify opportunities for corrective actions and/or refinements to mitigation measures described in Attachment 25.1 and Appendix E (Summary of Project Commitments) to further reduce or avoid potential impacts from the Project.³⁵

Canada Nickel will engage with Indigenous Nations in the design and implementation of the follow-up and monitoring programs, and evaluation of follow-up results and subsequent updates to the program. Canada Nickel will further engage Indigenous Nations for various monitoring programs on a go-forward basis, where appropriate.

Some examples of planned engagement activities and commitments include:

- Engaging with Apitipi Anicinapek Nation to develop a shared understanding of how the Project may affect its interests
- Engaging with Apitipi Anicinapek Nation to discuss the Project and its effects, understand concerns that may arise and respond to those concerns
- Engaging with Apitipi Anicinapek Nation to seek its opinions, recommendations and Nation-specific expertise in the development of monitoring programs relating to biodiversity

³⁴ See Chapter 33 (Sustainability).

³⁵ See Chapter 34 (Follow-Up Programs and Adaptive Management).

- Working directly with Apitipi Anicinapek Nation to identify opportunities for Apitipi Anicinapek Nation to realize potential benefits from the Project that can be used to both offset potential adverse effects and create positive effects for the Nation

Canada Nickel recognizes the importance of working in partnership with Apitipi Anicinapek Nation to establish a mutually beneficial, cooperative, and productive relationship centered around transparent information sharing, respectful engagement, open dialogue, and meaningful partnerships. Site access and continued engagement are key elements considered in the Impact Benefit Agreement under negotiation with Apitipi Anicinapek Nation. Canada Nickel will remain available through regulatory Application review should Apitipi Anicinapek Nation bring forward additional information related to this assessment or should concerns arise or requests for alternate engagement approaches be requested by Apitipi Anicinapek Nation. Through ongoing engagement (i.e., throughout the life of the Project) Canada Nickel aims to maintain a positive long-term relationship with Apitipi Anicinapek Nation.

25.9 Potential Effects on Federal Lands

There are no federal lands within the PA or the Indigenous Interests LSA. As such, there are no direct physical impacts (e.g., vegetation clearing and grading) that would occur on federal lands used or accessed by Apitipi Anicinapek Nation.

There are, however, federal lands within the Indigenous Interests RSA and these consist of Indigenous reserve lands. The closest lands under federal jurisdiction are Taykwa Tagamou Nation's reserve (New Post 69A) located approximately 37 km northeast of the PA and Flying Post First Nation's reserve (Flying Post 73) located approximately 46 km southwest of the PA. Apitipi Anicinapek Nation's reserve land (Abitibi 70) is located outside of the Indigenous Interests RSA, approximately 95 km south-east of the PA (refer to Section 25.2.1).

The Project is not expected to adversely affect Indigenous interests specific to federal lands (e.g., Indigenous reserves), as no changes to the environment are anticipated on these lands. Effects on federal lands (e.g., Indigenous reserves), in consideration of disproportionate effects on Indigenous Nations and women, are anticipated to be like other areas in the Economic Conditions LSA and RSA. Mitigation measures are provided in Attachment 25.1 and Appendix E (Summary of Project Commitments) for these various components. No additional mitigation measures beyond those identified are specifically required for federal lands.

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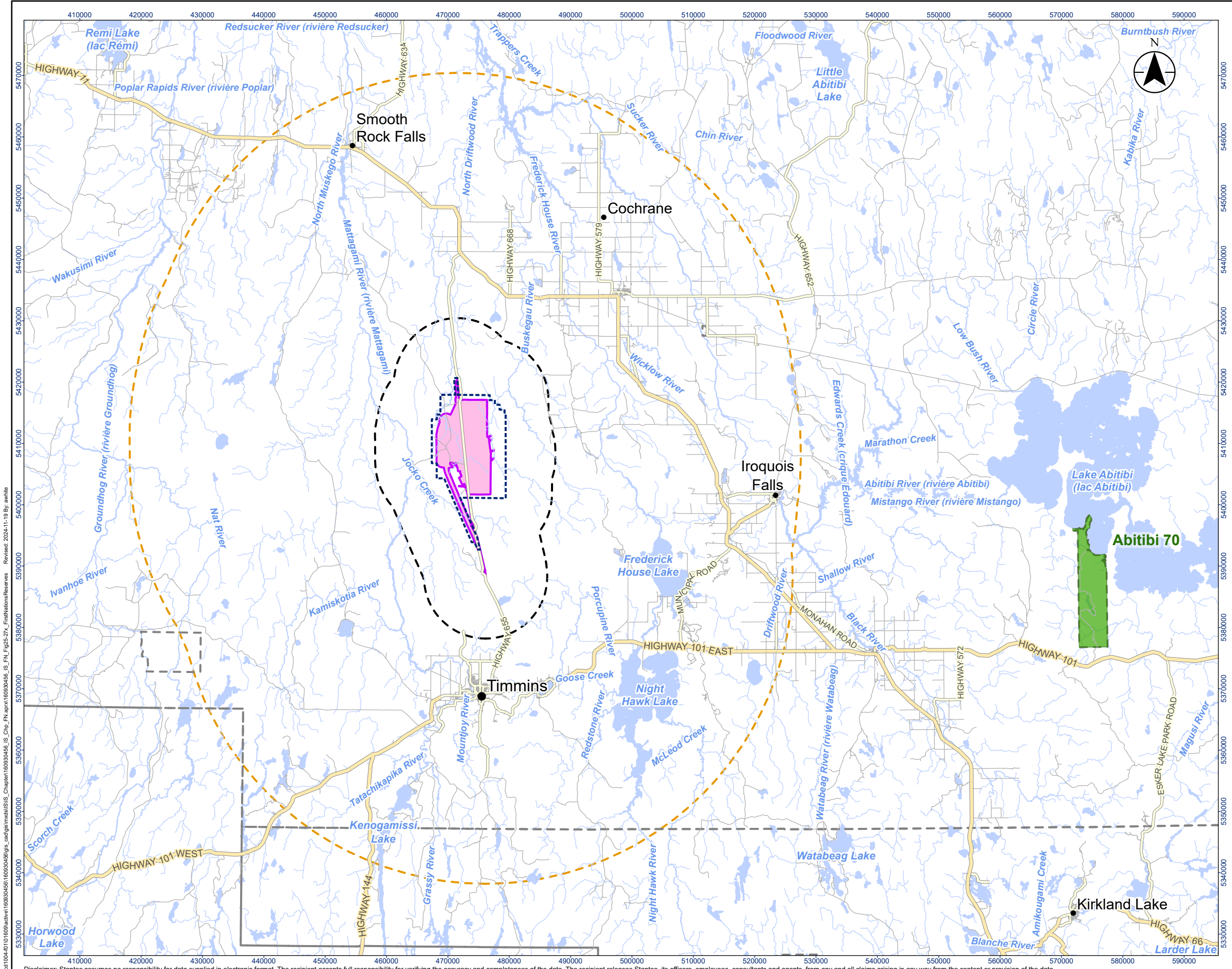
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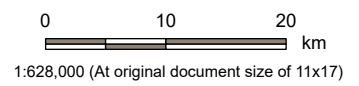
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25.11 Figures



- Legend**
- Project Area
 - Local Study Area
 - Regional Study Area
 - Modelled Mine Boundary
 - Apitipi Anicinapek Nation Reserve
 - Expressway / Highway
 - Major Road
 - Minor Road
 - Watercourse
 - Municipal Boundary
 - Waterbody



- Notes**
1. Coordinate System: NAD 1983 UTM Zone 17N
 2. Base features produced under license with the Ontario Ministry of Natural Resources and Forestry © King's Printer for Ontario, 2024.
 3. Treaty 9 boundaries adapted from Morris 1943 (1964 reprint). For cartographic representation only.
 4. Features are generalized. Not all waterbodies and watercourses are shown, due to the scale of the map.



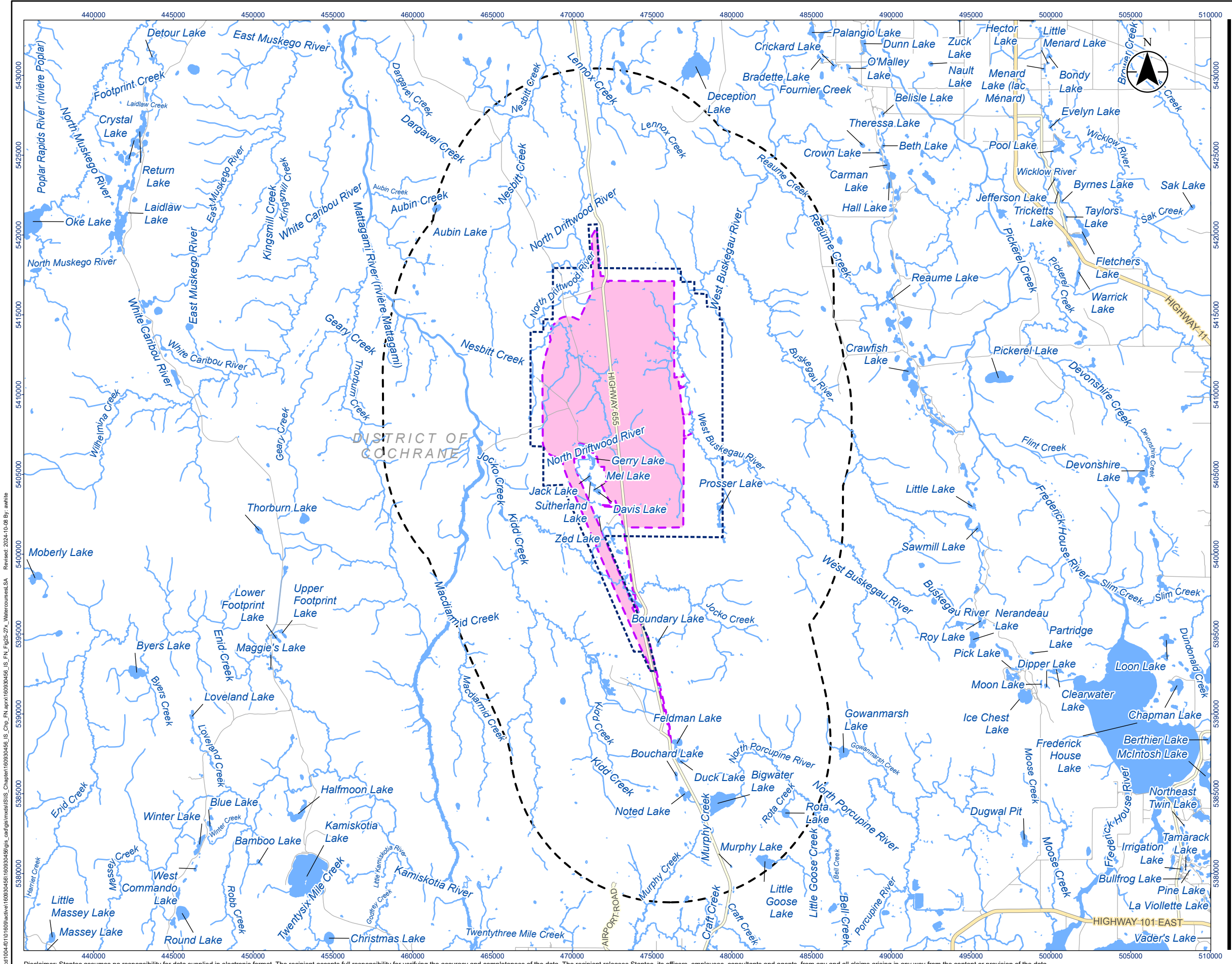
Project Location: Timmins, Ontario
 Prepared by: awhite on 2024-11-19

Client/Project: Canada Nickel Company (CNC)
 Crawford Nickel Project

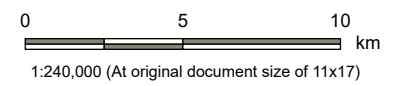
Figure No.: **25.1**

Title: **Indigenous Interests Assessment Areas - Apitipi Anicinapek Nation**

\s1004-101009\active\160930456\gis_carriage\mxd\IBIS_Chapter1\160930456_IS_FN_Fig25-27_ApitipiReserves_Revise24-11-19_by_awhite



- Legend**
- Project Area
 - Local Study Area
 - Modelled Mine Boundary
 - Expressway / Highway
 - Major Road
 - Minor Road
 - Watercourse
 - Waterbody
 - Municipal Boundary



- Notes**
1. Coordinate System: NAD 1983 UTM Zone 17N
 2. Base features produced under license with the Ontario Ministry of Natural Resources and Forestry © King's Printer for Ontario, 2024.

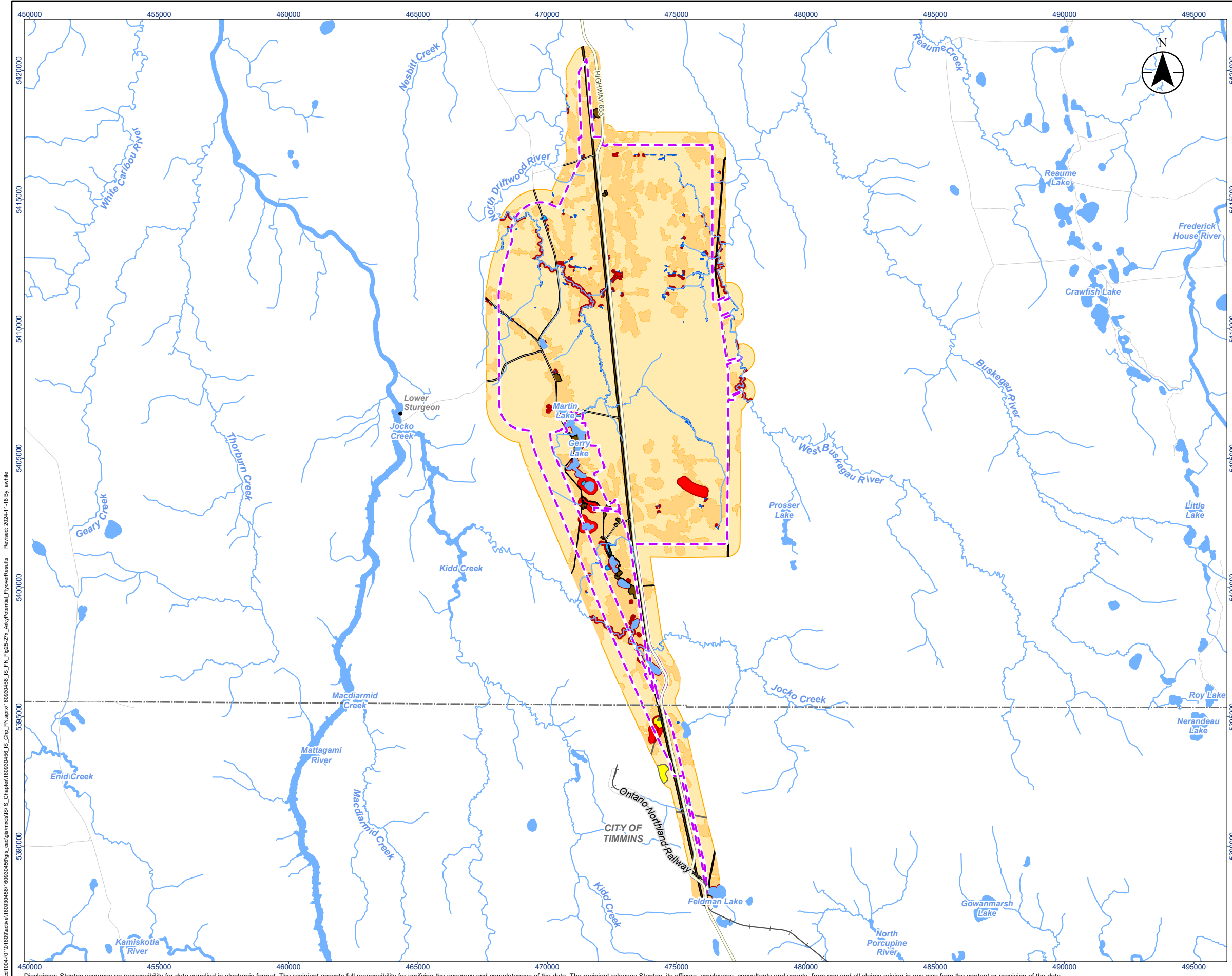
















Project Location: Timmins, Ontario
 Prepared by: awhite on 2024-10-08
 160930456 REVA

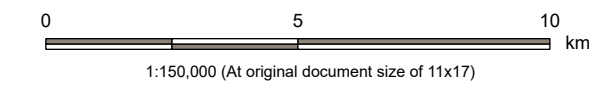
Client/Project:
 Canada Nickel Company (CNC)
 Crawford Nickel Project

Figure No.
25.2

Title
Waterbodies and Watercourses



- Legend**
-  Project Area
 - Archaeological Potential**
 -  Unploughable Land (wooded): Stage 2 Test-Pit Survey Required
 -  Permanently Low and Wet: No Further Assessment Required
 -  Over 50 m from Modern Water Sources: No Further Assessment Required
 -  Disturbed (Forestry Activity and Roads): No Further Assessment Required
 -  Previously Assessed: No Further Assessment Required
 -  Previously Assessed: Stage 1 Property Inspection Recommended
 -  Water
 -  Major Road
 -  Minor Road
 -  Railway
 -  Watercourse
 -  Municipal Boundary - Lower Tier
 -  Waterbody



- Notes**
1. Coordinate System: NAD 1983 UTM Zone 17N
 2. Base features produced under license with the Ontario Ministry of Natural Resources and Forestry © King's Printer for Ontario, 2023.
 3. Source: Stage 1 Archaeological Assessment, Crawford Nickel Project, District of Cochrane and City of Timmins, Ontario (Appendix B.11 of the Impact Statement)



Project Location: Timmins, Ontario
 160930456 REVA
 Prepared by awhite on 2024-11-18

Client/Project: Canada Nickel Company (CNC)
 Crawford Nickel Project

Figure No.: **25.3**

Title: **Archaeological Potential**

\s1004\101009\active\160930456\gis_cad\gis\mxd\160930456_15_FN_Fig25-27_ArchPotential_FlyoverResults_2024-11-18 By: awhite
 \s1004\101009\active\160930456\gis_cad\gis\mxd\160930456_15_FN_Fig25-27_ArchPotential_FlyoverResults_2024-11-18 By: awhite

Attachments

Attachment 25.1 **Apitipi Anicinapek Nation Engagement
Outcomes for the Crawford Nickel Project (the
Project)**

Apitipi Anicinapek Nation Engagement Outcomes for the Crawford Nickel Project

Row No.	Apitipi Anicinapek Nation's Perspectives and Concerns	Approximate Location Relative to Project	Apitipi Anicinapek Nation's Recommendations	Canada Nickel / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
1	<p>Cultural Continuity</p> <p>Apitipi Anicinapek Nation stated that it has used the lands within its Traditional Territory since time immemorial and that its members depend on a deep connection with their land to support their spiritual, cultural, and economic life.</p> <p>Apitipi Anicinapek Nation emphasized the importance of maintaining and protecting the culture, traditions, and land uses that include:</p> <ul style="list-style-type: none"> • Cultural and spiritual beliefs. • Transmission of Indigenous Knowledge, lifestyle, and practices to children. • Culturally and historically significant sites and sacred places such as Lake Abitibi, archaeological, heritage, burials and cemeteries, and significant landforms. • Habitation sites such as cabins and overnight campsites. • Hunting, trapping, fishing, and plant harvesting areas. • Trails and travel routes that provide access to important places within Apitipi Anicinapek Nation's Traditional Territory. <p>Apitipi Anicinapek Nation stated that they have a Cultural Department (AAN-CD) that provides community members a place to learn and engage in original ways of knowing and being. The goal of the AAN-CD is the preservation of the Apitipi Anicinapek Nation in recognition of the history of its traditional roots by reclaiming the First Nation's rightful responsibilities to the land and to enhance the quality of traditional and cultural learning in the community for all its members, and to make sure that all traditional roles and responsibilities are embraced in the learning process of gender equality. The mandate of the AAN-CD is to:</p> <ul style="list-style-type: none"> • Provide cultural support at the community level. • Support traditional land-based activities and programming. • Revitalize language, teachings, and traditional parenting program. • Support all ceremonies on an ongoing basis. • Engage all ages in the revitalization delivery process. 	<p>Project Area (PA), Local Study Area (LSA) and Regional Study Area (RSA).</p> <p>Apitipi Anicinapek Nation identified a cultural site approximately 25.5 km east of the PA at Lake Abitibi (sacred site).</p> <p>One hundred sixty-three cultural sites and points were identified by Apitipi Anicinapek Nation at locations 10 km or more from the PA.</p> <p>Other features and values identified by Apitipi Anicinapek Nation are provided in the following rows of this table to facilitate resource-specific responses.</p>	<p>Apitipi Anicinapek Nation recommends the following considerations for engagement and collaboration with Canada Nickel:</p> <ul style="list-style-type: none"> • A meeting with Canada Nickel and the IAAC as soon as possible to discuss Apitipi Anicinapek Nation's participation in the planning and impact statement phases of the impact assessment process. • Full participation by Apitipi Anicinapek Nation in the impact assessment and consultation with the Crown on the Project impacts, mitigation or enhancement measures, and accommodation for impacts. • The proponent holds regular community meetings with Apitipi Anicinapek Nation and conducts continuous and ongoing consultation. • The development of a Communication Protocol to assist in achieving effective communication between Apitipi Anicinapek Nation and the Proponent. • Support for development of and opportunity for Apitipi Anicinapek Nation to lead its own studies. • Specific engagement opportunities with Canada Nickel, such as leading studies to support the development of the Impact Statement, including Indigenous Knowledge and Land Use studies. • Co-drafting portions of the Impact Statement, such as an assessment of the potential impacts of the Project, including cumulative impacts, on the exercise of Indigenous and Treaty Rights. • Respect the processes and protocols established by Indigenous communities related to the ownership, management, and control of Indigenous Knowledge. • Adequate funding to Indigenous communities to support their participation in the development of Canada Nickel's Impact Statement, and during the post-approval phases of the impact assessment process. • Consent of Indigenous communities throughout the impact assessment process. 	<p>Canada Nickel acknowledges that the Project may have an impact on the exercise of Aboriginal and/or Treaty rights of the Indigenous Peoples recognized and affirmed in section 35 of the <i>Constitution Act</i>, 1982, including on Apitipi Anicinapek Nation. Canada Nickel values, and has, where possible, incorporated the recommendations made by Apitipi Anicinapek Nation regarding the Project. Responses to Apitipi Anicinapek Nation's recommendations are provided below.</p> <p>Regarding Apitipi Anicinapek Nation's recommendations for engagement and collaboration:</p> <ul style="list-style-type: none"> • Apitipi Anicinapek Nation was identified as one of the Indigenous Nations that make up the Crown Consultation list and who were informed of the Project during the Pre-Planning Phase of the Project's impact assessment process. Canada Nickel recognizes the importance of working in partnership with Apitipi Anicinapek Nation to establish a mutually beneficial, cooperative, and productive relationship centered around transparent information sharing, respectful engagement, open dialogue, and meaningful partnerships. • To this end, Canada Nickel has provided resources to support Apitipi Anicinapek Nation's participation in the assessment process, including the formation Impact Assessment Process Agreement with the Nation, which includes: <ul style="list-style-type: none"> • The full participation of Apitipi Anicinapek Nation in the federal Impact Assessment process. • The preparation of its Nation-led studies for the Project (e.g., Socio-economic studies, Indigenous Knowledge and Land Use studies). • Canada Nickel is also negotiating an Impact Benefit Agreement (IBA) with Apitipi Anicinapek Nation. The specific content of the IBA established with Apitipi Anicinapek Nation is considered confidential, however, the purpose of this agreements is: <ul style="list-style-type: none"> • A commitment by Canada Nickel to engage in ongoing consultation with Apitipi Anicinapek Nation. • Opportunities to participate in the benefits of the Project through business, and training, and financial compensation. • The development and implementation of measures to protect the environment for ongoing and future use by Apitipi Anicinapek Nation members. • To facilitate effective, efficient, and streamlined consultation with Apitipi Anicinapek Nation by Canada Nickel relating to regulatory permitting, approval processes, and other environmental matters associated with the Project and Project activities. • The basis for legal certainty and the support of Apitipi Anicinapek Nation for the Project. <p>A description of Canada Nickel's engagement with Apitipi Anicinapek Nation is provided in Chapter 7.</p> <p>Since the submission of the Detailed Project Description (DPD), Canada Nickel has continued sharing Project information with Apitipi Anicinapek Nation based on a current understanding of the Nation's Territory and the terms of the established agreements. The data used throughout the Impact Statement has been presented according to the preference of Apitipi Anicinapek Nation through its iterative reviews, its respective policies and protocols, consent for its use and</p>	<p>Chapter 25, Sections 25.1.2, 25.4, 25.5.</p> <p>Chapters 7, 12, 13, 20, 22, 23 and 29.</p>

Row No.	Apitipi Anicinapek Nation's Perspectives and Concerns	Approximate Location Relative to Project	Apitipi Anicinapek Nation's Recommendations	Canada Nickel / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
	<ul style="list-style-type: none"> • Provide cultural activities and programming at the community level. • Support the needs of historical influence. • Provide cultural support for school age children and youth. • Utilize Elder's Knowledge and Knowledge Keepers in the delivery process. • Schedule land base approach, planning of each harvest season. • Foster and preserving rites of passage. <p>Potential effects to cultural continuity, identified by Apitipi Anicinapek Nation include:</p> <ul style="list-style-type: none"> • Potential impacts to current and future use of lands and resources, including from construction of the rail line, transmission line, and highway relocation; an increase in temporary workers; and perceived and real changes to the visual landscape, air quality, noise and vibrations, and contamination. These Project activities could affect access to harvesting, traplines and hunting camps, wildlife corridors, breeding grounds, and overwintering sites, the experience of being on the water, water quality and/or quantity, fish and fishing and harvesting and gathering of medicines, plants, and mushrooms. • The Project's contribution to climate change. • Effects on the rights and interests of Apitipi Anicinapek Nation. <p>Through engagement with Canada Nickel, Apitipi Anicinapek Nation expressed concern about:</p> <ul style="list-style-type: none"> • The level of information contained in the biophysical chapters of the Impact Statement and a lack of consultation regarding the transmission line. • The Project's contribution to cumulative effects and its members abilities to continue their way of life. • The compounding effects of colonialism and a diminishment of the sovereignty and decision-making power of Apitipi Anicinapek Nation. • Reductions in land use due to the cumulative effects of other developments in the area including drill sites and access roads and the Projects contribution. • The cumulative effects from mining, forestry, hydropower, agriculture (especially herbicide spraying), and linear 		<ul style="list-style-type: none"> • Opportunities to verify the Agency's and Canada Nickel's records of Indigenous consultation and engagement. • Provide sufficient time for Apitipi Anicinapek Nation to complete the following studies, which should then be co-considered in the Impact Statement: Indigenous Knowledge and Land Use Study, Health and Socio-economic Baseline Study. • Include provisions for childcare and to remove other barriers to support diverse participation in the engagement process. • All costs associated with Apitipi Anicinapek Nation's participation in the Project be covered by Canada Nickel. • Participation in assessment methodology, biophysical components, including for the atmospheric, acoustic, and visual environments; water quality and quantity; vegetation; fish and fish habitat; wildlife; GHG emissions; and species at risk, health conditions, archaeological studies, decommissioning plans; and follow-up and monitoring. • Apitipi Anicinapek Nation has the opportunity to review and comment on all documents, studies, licences, permits etc. associated with the Project and involvement in the determination of mitigation measures. • Indigenous languages should be respected throughout engagement if requested. • Acknowledgement that the Project is located on lands traditionally used by Apitipi Anicinapek Nation. • Ongoing consultation, accommodation and meaningful consent of Apitipi Anicinapek Nation through involvement in Project-related decisions, transparent communication, site visits and regular community events to update members on Project activities. • Provide financial resources for cultural ceremonies, festivals, and community-building events to help the community heal, resolve political conflicts, and strengthen cultural identity. • Establish revenue-sharing agreements that contribute to Apitipi Anicinapek Nation's long-term community development. <p>Apitipi Anicinapek Nation recommends the following considerations regarding Project design and activities:</p>	<p>public disclosure, and views regarding the characterization of its data and Indigenous Knowledge within the assessment.</p> <p>Canada Nickel recognizes that western knowledge and worldviews, which have been the foundation for current Canadian and provincial legislation, policy, regulation, and institutions, may constrain how Indigenous Knowledge is incorporated in Project planning. Canada Nickel also recognizes that Indigenous Nations are best positioned to identify their priorities and interests, and to share their views in their own words, and that such information requires the same consideration as any other information source (Chapters 7 and 25). Where made available by Apitipi Anicinapek Nation through engagement, information gathering, and voluntary information sharing, Indigenous Knowledge has been reviewed and incorporated in the Impact Statement, as applicable. Through engagement activities, Apitipi Anicinapek Nation has been requested to provide feedback with respect to potential impacts of the Project on its rights and interests and has been provided the opportunity to validate the use of its Indigenous Knowledge in the Impact Statement.</p> <p>Regarding Apitipi Anicinapek Nation's concern for potential impacts to current and future use of lands, the following measures will be implemented by Canada Nickel to reduce potential adverse effects of the Project on air quality:</p> <ul style="list-style-type: none"> • Canada Nickel will develop and implement an Air Quality Management Plan (AQMP) which will describe the efforts to be taken to manage the effects of the Project on ambient air quality in accordance with provincial regulatory requirements. The AQMP will specify the mitigation measures for the management and reduction of air emissions during Project construction and operations. • Primary crushers, secondary crushers and crushed ore Stockpiles will be enclosed and equipped with dust collectors or vent filters as necessary allowing to filter the internal air before the exhaust is released to the environment. • Usage of dust suppressants during non-precipitation days in the summertime. Watering application rates and intervals will be adjusted to achieve the required mitigation efficiency, and additional operational measures that can control water evaporation rates will be implemented if needed. • Implement an idling policy on site for mobile equipment and vehicles. • Where possible maintain existing vegetation along the haul roads to act as a wind break. <p>Regarding Apitipi Anicinapek Nation's concern for potential impacts to current and future use of lands and resources, as described in Chapter 13, a Noise and Vibration Management Plan will also be developed for the Project which will describe:</p> <ul style="list-style-type: none"> • Requirements for the routine management/maintenance of sources of noise and vibration during construction and operations. • Communication protocol requirements and a procedure for verifying and addressing complaints. <p>Regarding Apitipi Anicinapek Nation's concern for the compounding effects of colonialism, Canada Nickel understands that various rulings and acts implemented over more than the last 150 years, including European settlement in Canada, and the creation and implementation of Canadian policy and law have transformed the lives of Indigenous Peoples and have shaped</p>	

Row No.	Apitipi Anicinapek Nation's Perspectives and Concerns	Approximate Location Relative to Project	Apitipi Anicinapek Nation's Recommendations	Canada Nickel / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
	<p>infrastructure on Apitipi Anicinapek Nation's ability to exercise its Indigenous and Treaty rights.</p> <ul style="list-style-type: none"> • Mine abandonment and reclamation plans. • Avenues of consent and consensus of Apitipi Anicinapek Nation relative to the <i>Mining Act</i>. • Regulatory and permitting processes and Indigenous consent for projects 		<ul style="list-style-type: none"> • Apitipi Anicinapek Nation to be represented in the maps that depict the Indigenous reserves located near the Project. • Integrate information obtained through consultation to characterize Apitipi Anicinapek Nation land and resource uses. • Inclusion/consideration of cumulative effects in each Valued Component (VC) chapter of the Impact Statement. • Indigenous Knowledge on equitable footing with scientific or technical information to inform the impact assessment. • Canada Nickel provides further information on how confidential Indigenous Knowledge and traditional land use information will be protected. • Consider potential for Nation-led assessment in the Impact Statement • Canada Nickel clearly defines the terms local and regional in all future impact assessment documents. • Canada Nickel to fund Apitipi Anicinapek Nation environmental monitors throughout the lifecycle of the Project and establish an Environmental Advisory Committee. • Measures to prevent and avoid accidents, including release of hazardous materials, spills, transportation and storage of dangerous goods, tailings dam breach, and forest fires (from increased rail traffic); and details of plans to notify, involve and communicate with local residents, including Indigenous residents and in Indigenous languages. • Alternative corridors for the new 230 kilovolt transmission line corridor, relocated Highway 655, rail spur, and relocated 500 kilovolt transmission line. • Potential re-use of excavated waste rock to improve nearby ATV trails. • Greenhouse gas emissions should not exceed regulatory guidelines. 	<p>Indigenous Peoples' rights and subsequently resulted in cumulative effects on Apitipi Anicinapek Nation's exercise of Indigenous and Treaty Rights in the Treaty 9 area and in the Nation's Traditional Territory. Canada Nickel is committed to ongoing engagement with Apitipi Anicinapek Nation, and is developing several policies, procedures, and training which will mitigate adverse residual cumulative effects on the bio-physical environment and on social conditions (Code of Conduct and Ethics, Violence and Harassment, Diversity and Inclusion, Fit for Duty, including Drug and Alcohol Policy, Cultural Awareness Training).</p> <p>Regarding Apitipi Anicinapek Nation's recommendation for alternative corridors:</p> <ul style="list-style-type: none"> • The Project does not include a new transmission line as the Project will connect directly to a 230 kV transmission line constructed and operated by a third party as part of an independent transmission expansion project that is expected to promote stronger electricity reliability for northern communities and Indigenous Nations. A Transmission Facilities Class EA was initiated by the third party for the 230 kV transmission line project in 2023. • As the ore deposit is partially located under the existing Highway 655/500 kV transmission line corridor, realignment of an approximately 26 kilometre (km) segment of the highway and transmission line is required to accommodate the Open Pit and other Project components, since mine operation would not be feasible without relocating the corridor (Chapter 5). Only a single corridor was considered given that using the same physical space (smaller footprint than separate alignments) would be more efficient and result in: <ul style="list-style-type: none"> • Reduced potential for environmental effects. • Reduced need for materials needed during construction of the realignment. • Reduced visual clutter by avoiding multiple parallel lines of infrastructure. • The proposed locations of the corridors for facilities and infrastructure ancillary to the Project will be built and/or operated by others but are included in the activities considered in the assessment. Apitipi Anicinapek Nation concerns regarding ancillary components will be communicated by Canada Nickel to the third-parties responsible for their construction and/or operation. <p>Regarding Apitipi Anicinapek Nation's recommendation that greenhouse gas emissions should not exceed regulatory guidelines, Canada Nickel assessed the existing meteorological environment and conducted a Climate Change Resilience Assessment (Appendix N). The Project is expected to result in a net release of GHG emissions during the Project's lifetime, the magnitude of which is estimated to be 11,135 kilotonnes (kt) of carbon dioxide equivalent (CO_{2e}). Activities related to disturbance, removal and reclamation of vegetation and soil within the PA are expected to result in changes to carbon sinks, as all other activities do not result in land use changes which may affect carbon sequestration potential. However, the Project is also expected to result in a net increase in carbon sinks, and therefore carbon sequestration potential during the Project's lifetime, the magnitude of which is estimated to be 46,678 kt CO_{2e}. Overall, the Project will sequester more CO_{2e} than will be emitted by Project activities.</p> <p>To mitigate potential effects to climate change, Canada Nickel has developed and will implement a net-zero plan for the Project and is committed to continuous improvement of the net-zero plan, as new technology becomes available or best practices evolve. The Project's net-zero plan is designed based on the following three principles:</p>	

Row No.	Apitipi Anicinapek Nation's Perspectives and Concerns	Approximate Location Relative to Project	Apitipi Anicinapek Nation's Recommendations	Canada Nickel / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
				<ul style="list-style-type: none"> Avoid: prioritize the avoidance of emissions during design and engineering phases (i.e. the integration of BAT/BEP). Reduce: continuously evaluate and assess further emission reductions based on the changing environment (i.e. the rapid evolution of technology and economics). Offset: offsetting of residual sources of hard to abate emissions. <p>Canada Nickel will use regular reviews and monitoring of mitigation opportunities to make future decisions and investments aligned with the net-zero plan. Decision-making will be based on numerous factors including associated costs, technical challenges, risks, infrastructure requirements, global competitiveness, government policies and stakeholder and rights holder considerations.</p> <p>Regarding Apitipi Anicinapek Nation's concern for reduction in land use, Canada Nickel will maintain access to the lower Sturgeon Dam Road and Camp 40 Road for use by Apitipi Anicinapek Nation.</p> <p>Regarding Apitipi Anicinapek Nation's recommendation on measures to prevent and avoid accidents and spills, additional information is provided in Row 3.</p> <p>Chapter 25 (Section 25.5) provides the assessment of Project-related effects and residual cumulative effects specific to and reflective of the interests of Apitipi Anicinapek Nation. It was informed by the assessment of cumulative effects relative to each of the VCs considered in Chapter 29 of the Impact Statement.</p> <p>Canada Nickel recognizes the interests of Indigenous Nations in all aspects of Project activities and environmental protection. Canada Nickel is committed to continue discussions regarding Apitipi Anicinapek Nation's concern about potential environmental impacts during construction and post-construction activities, as well as the mitigation measures to reduce such impacts. Canada Nickel will follow-up with Apitipi Anicinapek Nation regarding their request for involvement in monitoring to clarify potential issues and interests, and to gather further information and knowledge to inform possible next steps, for the benefit of both parties.</p> <p>Canada Nickel will continue to engage Apitipi Anicinapek Nation to understand and mitigate the Project's impacts on its interests, explore opportunities to enhance Project benefits included in the IBA, and consider its recommendations and input on Project decisions, including the development of management plans and offsetting (e.g. Construction Environmental Protection Plan). Through this ongoing collaboration, Canada Nickel aims to foster a positive long-term relationship with Apitipi Anicinapek Nation throughout the life of the Project.</p> <p>The complete listing of mitigation measures is provided in Appendix E (Summary of Project Commitments) of the Impact Statement.</p>	
2	<p>Cultural Heritage</p> <p>Apitipi Anicinapek Nation emphasized the importance of maintaining and protecting the culture, traditions, and land uses, which include culturally and historically significant sites and sacred places such as Lake Abitibi, archaeological, heritage, burials and cemeteries, and significant landforms.</p>	<p>PA, LSA, RSA</p> <p>Apitipi Anicinapek Nation identified one potential burial site that intersects with the north end of the PA.</p>	<p>Apitipi Anicinapek Nation recommends the following considerations for engagement and collaboration with Canada Nickel:</p> <ul style="list-style-type: none"> Specific engagement opportunities with Canada Nickel, such as, leading studies to support the development of the Impact Statement, including an Indigenous-led evaluation of effects on cultural and physical heritage. 	<p>Regarding Apitipi Anicinapek Nation specific engagement opportunities with Canada Nickel, such as, leading studies to support the development of the Impact Statement, including an Indigenous-led evaluation of effects on cultural and physical heritage, additional information is provided in Row 1 of this table.</p> <p>Descriptions of the archaeological assessment work undertaken for the Project is provided in Chapter 25 (Section 25.2.5.5).</p> <p>A Stage I Archeological Assessment (Stage 1 AA) was undertaken for the Project.</p>	<p>Chapter 25, Sections 25.2.5.5 and 25.4.2.</p>

Row No.	Apitipi Anicinapek Nation's Perspectives and Concerns	Approximate Location Relative to Project	Apitipi Anicinapek Nation's Recommendations	Canada Nickel / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
	<p>Apitipi Anicinapek Nation noted that cultural heritage includes sacred, ceremonial, or culturally important places (e.g., waterbodies including the Mattagami River and Abitibi River), plants (e.g., cedar, sage, spruce, sweetgrass), animals (e.g., bald eagles, moose, spirit moose), objects, beings or things and teaching areas used to transfer knowledge between generations; as well as sites occupied historically.</p> <p>Potential effects to cultural heritage identified by Apitipi Anicinapek Nation include:</p> <ul style="list-style-type: none"> Impacts to the potential for physical and cultural heritage resources and structures, sites, or things of historical, archaeological, paleontological or architectural significance in or near the PA. Impacts to potentially unknown or previously unrecorded cultural sites due to the cumulative effects of colonialism disrupting knowledge transfer. 	<p>Additional cultural heritage areas were identified at locations:</p> <ul style="list-style-type: none"> 4.0 km west of the PA (Mattagami River [culturally important place]) 36.5 km northeast of the PA (Abitibi River [culturally important place]) 	<ul style="list-style-type: none"> Descriptions of planned, ongoing, or completed archaeological assessments, and whether the Project could affect underwater archaeological resources. 	<p>The following measures will be implemented by Canada Nickel to reduce potential adverse effects of the Project on cultural heritage:</p> <ul style="list-style-type: none"> Complete Stage 2 archeological assessment (Stage 2 AA) of areas identified as retaining archaeological potential in the Stage 1 archeological assessment. If archaeological resources are found and determined to have cultural heritage value or interest (CHVI) then complete additional recommended work, such as Stage 3 archaeological assessment and, if necessary, Stage 4 mitigation of archaeological resources as per the Ontario Ministry of Citizenship and Multiculturalism's <i>Standards and Guidelines for Consultant Archaeologists</i>. Prepare and Implement an Archaeological Resources Protection Plan. Canada Nickel will have a Heritage Chance Find Protocol agreed upon between the Indigenous Nations and Canada Nickel. If an archaeological resource is discovered during the construction phase, all construction will cease within radius of at least 20 m of the archaeological resource. A licensed archaeologist will be retained by Canada Nickel and a Stage 2 AA will be conducted with the participation of any interested Indigenous Nations. Follow-up Stage 3 or Stage 4 archaeological investigations will be conducted, as required. Once any archaeological resources with CHVI have been mitigated through excavation, construction will proceed. Prepare and implement a worker education program about appropriate protocols in case of accidental discoveries. Further assessment in case of changes to the Project Area (PA) through the life of the Project. <p>Additional information regarding Apitipi Anicinapek Nation specific engagement opportunities with Canada Nickel, such as, leading studies to support the development of the Impact Statement, is provided in the Row 1 of this table.</p> <p>The complete listing of mitigation measures is provided in Appendix E (Summary of Project Commitments) of the Impact Statement.</p>	
3	<p>Health and Well-Being</p> <p>Apitipi Anicinapek Nation emphasized the importance of maintaining and protecting the well-being and safety of the community.</p> <p>Potential effects to health and well-being identified by Apitipi Anicinapek Nation include:</p> <ul style="list-style-type: none"> Impacts to human health, including actual and perceived risks at key receptors due to changes to noise levels, air quality, recreational and drinking water quality, proximity to transmission lines, and accessibility and contamination of country foods. Impacts on social well-being from in and out migrations, including crime rates, addiction, mental health, impacts to 	PA, LSA, RSA	<p>Apitipi Anicinapek Nation recommends the following considerations for engagement and collaboration with Canada Nickel:</p> <ul style="list-style-type: none"> Specific engagement opportunities with Canada Nickel, such as, leading studies to support the development of the Impact Statement (e.g., an Indigenous-led evaluation of effects on health and socio-economic conditions). Funding for community infrastructure, such as roads, housing, renewable energy projects, powwow grounds and community facilities. Funding to expand and improve community health services, including a new health clinic, healing lodges and other spaces dedicated to traditional healing practices and wellness programs. 	<p>Canada Nickel has provided engagement opportunities for Apitipi Anicinapek Nation relative to the Project, including the opportunity and funding to conduct Nation-led studies for the Project that focus on Indigenous health and socio-economic conditions. Additional information is provided in Row 1 of this table.</p> <p>Regarding Apitipi Anicinapek Nation's concerns for impacts to human health and social well-being, including actual and perceived risks, Chapter 21 includes an assessment of effects on changes to physical health, community safety, and mental health and social well-being. This assessment is summarized in Chapter 25 in relation to Apitipi Anicinapek Nation interests (Sections 25.4.3 and 25.5.4).</p> <p>Changes in air, water, country foods and sensory disturbances were addressed in the Human Health and Ecological Risk Assessment (HHERA). This assessment examined the interactions between measured or modelled concentrations of chemicals in the environment for these components and addressed the potential for these interactions to result in adverse health risks to humans. Chemicals associated with construction, operation and closure of the Project were assessed and toxicological risks were addressed in accordance with regulatory guidelines. The</p>	<p>Chapter 25, Sections 25.4 and 25.5.</p> <p>Chapters 21, 22 and 31.</p>

Row No.	Apitipi Anicinapek Nation's Perspectives and Concerns	Approximate Location Relative to Project	Apitipi Anicinapek Nation's Recommendations	Canada Nickel / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
	<p>women, girls, and 2SLGBTQI+2, and discrimination and violence towards Indigenous Peoples.</p> <ul style="list-style-type: none"> Impacts to local community services and infrastructure, including women's shelters, health facilities, mental health and addiction facilities, emergency services, childcare, and housing availability and pricing. Impacts from accidents and malfunctions during the life of the Project that could affect the natural environment and physical and mental health of Apitipi Anicinapek Nation members. Health impacts to its members from eating contaminated country foods. Cumulative loss of access to traditional lands and food sources will exacerbate both physical and mental health challenges already reported by Apitipi Anicinapek Nation members. 		<ul style="list-style-type: none"> Funding and support for addressing existing on-reserve infrastructure concerns, such as mold and insufficient septic systems. 	<p>results were considered in the development of mitigation and management measures, and further informed the assessment on Apitipi Anicinapek Nation interests.</p> <p>The following measures will be implemented by Canada Nickel to reduce potential adverse effects of the Project on human health and social well-being:</p> <ul style="list-style-type: none"> Canada Nickel will develop a Health and Medical Services Plan to manage occupational and non-occupational injuries and illnesses. This will include provision of medical care at the Project site through onsite presence of medical personnel. Canada Nickel will also make available an online physician 24 hours/day. Canada Nickel has made, and will continue to make, contributions to support social, economic, health, and other activities/programs for local, including Indigenous, communities through its Community Contributions Program. The Program will include a local procurement policy as well as a sponsorship and donation strategy adapted to Canada Nickel's guiding principles and the needs of the communities. Canada Nickel has developed an internal Whistleblower Program for employee feedback and communication of concerns, as well as an external feedback mechanism to capture Project-related comments and concerns from community members. Canada Nickel presently has or is in the process of developing several policies, procedures, and training which will mitigate adverse effects on health which include Code of Conduct and Ethics; Violence and Harassment; Diversity and Inclusion; Fit for Duty, including Drug and Alcohol Policy; Cultural Awareness Training. <p>Regarding Apitipi Anicinapek Nation's concerns for impacts to local community services and infrastructure, Chapter 22 includes an assessment of effects on a change in demand for community services and infrastructure, including a change in demand for transportation infrastructure. This assessment is summarized in Chapter 25 in relation to Apitipi Anicinapek Nation interests (Sections 25.4.3 and 25.5.4).</p> <p>The following measures will be implemented by Canada Nickel to reduce potential adverse effects of the Project on community services:</p> <ul style="list-style-type: none"> Canada Nickel will engage with local municipalities on the availability of housing to inform the housing strategy for the area that encourages and provides opportunities for workers to move permanently into the area. Canada Nickel is in regular communication with local training/education institutions regarding existing, upcoming, and potential course and training offerings, and how this aligns with Canada Nickel's anticipated needs. Canada Nickel continues to explore education, training opportunities and will develop hiring practices that encourages the employment and retention of qualified Indigenous peoples and local community members, including opportunities targeted towards youth Canada Nickel will explore opportunities to support training, education, and scholarship programs that improve employment opportunities, including participation in and contribution to local training networks, which are targeted at diverse groups such as Indigenous Nations, local youth, and various relevant subgroups, such as the Indigenous Skills and Employment Training Program. 	

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				<ul style="list-style-type: none"> • Canada Nickel will communicate Project needs to local accommodation providers, including hotel, motel, and bed-and-breakfast accommodation providers to help secure rooms for construction workers. • Canada Nickel will provide security at the Project site. • Canada Nickel will develop a Diversity and Inclusion Policy, which encompasses respectful workplace behaviours for diverse groups such as Indigenous Nations, local youth, seniors, 2SLGBTQQIA+, visible minorities, persons with disabilities and members of the GBA Plus community. Such a policy and subsequent training consist of awareness training for non-Indigenous employees to foster a respectful working relationship with Indigenous employees and contractors. <p>Regarding Apitipi Anicinapek Nation's concern for housing availability and pricing:</p> <ul style="list-style-type: none"> • Canada Nickel conducted a housing needs assessment for the Project and determined that there is a sufficient supply of home ownership housing (as opposed to rentals) in the District of Cochrane to support a new workforce. Canada Nickel will engage with local municipalities on the availability of housing to inform the housing strategy for the area that encourages and provides opportunities to move permanently into the area. • Canada Nickel will undertake a detailed Project accommodation study based on workforce requirements and develop an Accommodations Management Plan. • The presence of the Project may create positive effects for Apitipi Anicinapek Nation if potential demands on accommodations result in efforts to increase the stock of permanent and temporary housing in the region. <p>Regarding Apitipi Anicinapek Nation's concern for impacts from accidents and malfunctions, Chapter 31 includes an assessment of effects of potential accidents or malfunctions, including safety and mitigation measures, and a preliminary outline of an Emergency Preparedness and Response Plan (EPRP).</p> <p>The following measures will be implemented by Canada Nickel to reduce potential accidents or malfunctions:</p> <ul style="list-style-type: none"> • Canada Nickel will design, construct and operate the Project according to accepted standard practices for healthy, safety and environmental management, to reduce the risk of potential Project-related environmental, health, social and economic effects and effects to Indigenous Nations, including those that could result from accidents or malfunctions. • Canada Nickel will maintain construction equipment in good working order and implement careful maintenance and monitoring of all equipment to reduce emissions and the risk of spills or leaks of petroleum-based products. • Canada Nickel will develop and apply procedures and training aimed at safe operation of the Project, that reduce or prevent the potential conditions that may lead to accidents or malfunctions. • Canada Nickel will develop and implement Environmental Management Plans for the Project to outline the proposed safety and mitigation measures and commitments to be carried out by Canada Nickel and their contractors. 	

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				<p>Regarding Apitipi Anicinapek Nation's concern for potential changes for safety of women and youth due to the Project, the GBA Plus analysis conducted in Chapter 25 (informed by the GBA Plus analysis in Chapter 21 Health, Chapter 22 Social Conditions and Chapter 23 Economic Conditions), considers potential effects on and risk of change in safety for Indigenous women and youth. Canada Nickel is committed to providing cultural awareness training to enhance the outside workforces' understanding of Indigenous histories and cultures and to describe the root causes of inequities that Apitipi Anicinapek Nation experiences. Canada Nickel will engage with Apitipi Anicinapek Nation to develop the cultural awareness training so that it includes topics of importance to the Nation (e.g., Treaty; MMIWG). Additionally, Canada Nickel will implement a harassment policy and an internal whistleblower mechanism for confidential reporting of workplace harassment to mitigate disproportionate effects to Indigenous women and 2SLGBTQIA+ employed by the Project.</p> <p>Regarding Apitipi Anicinapek Nation's concern specific to air quality, noise and vibrations, additional information is provided in Row 1.</p> <p>Regarding Apitipi Anicinapek Nation's concern specific to water quantity and quality, additional information is provided below in Row 6.</p> <p>The complete listing of mitigation measures applicable to Health conditions potentially affected by the Project is found in Chapter 21 of the Impact Statement and the complete listing of mitigation measures is provided in Appendix E (Summary of Project Commitments) of the Impact Statement</p>	
4	<p><u>Economic Benefits, Investment and Inclusion</u></p> <p>Apitipi Anicinapek Nation emphasized the importance of maintaining or improving the ability of members to earn a living and share the benefits produced by activities within their Traditional Territory, which include:</p> <ul style="list-style-type: none"> • Apitipi Anicinapek Nations' traditional economy. • Business development opportunities. • Employment opportunities. • Commercial activities, including ownership and revenue-sharing of the Project. • Joint ventures, access to business contracts and co-development and implementation of environmental, socio-economic, and cultural monitoring programs for the life of the Project. • Quality of life and living conditions for members. • Self-sufficiency of the community as a whole and its members. • Education and training. • Treaty land entitlements and other Apitipi Anicinapek Nation-owned land or land interests. 	PA, LSA, RSA	<p>Apitipi Anicinapek Nation recommends the following considerations for engagement and collaboration with Canada Nickel:</p> <ul style="list-style-type: none"> • That an Impact Benefit Agreement (IBA) or similar agreement be negotiated between the Nation and Canada Nickel, including commitments for employment, training and contracting opportunities. • Canada Nickel establishes funds for scholarships and apprenticeships to assist Apitipi Anicinapek Nation youth find long-term employment opportunities in the mining industry and beyond. <p>Prioritize the hiring of Apitipi Anicinapek Nation members for employment associated with the Project, including roles as environmental monitors, liaisons, and other positions that respect and utilize Indigenous Knowledge.</p>	<p>Canada Nickel has provided engagement opportunities for Apitipi Anicinapek Nation relative to the Project, including the opportunity to identify economic interests in the Project through an IBA process. Additional information is provided in Row 1 of this table.</p> <p>Canada Nickel recognizes the unique role that industry can play in supporting Indigenous peoples, including supporting equitable access to jobs, training, and education opportunities. Canada Nickel will therefore place a focus on regional and Indigenous employment when seeking to fill workforce requirements for construction and operation.</p> <p>Canada Nickel has held early discussions with Indigenous Nations, Keepers of the Circle, local colleges, and other regional training institutions around ways to emphasize Indigenous employment in the mining industry.</p> <p>Canada Nickel has provided information about contracting and employment opportunities with Indigenous Nations, as well as obtain information regarding employment interests and the capacity and the capabilities of Indigenous Nations related to Project needs. Canada Nickel is committed to continue discussing potential economic participation in the Project to help build reciprocal business relationships with Apitipi Anicinapek Nation, including engaging contractors to uphold commitments to encourage participation of local Indigenous services on the Project, where possible.</p> <p>Engagement with Indigenous Nations throughout the assessment supported Canada Nickel's understanding of the needs of diverse population groups to help enhance employment opportunities through strategic, targeted programs.</p> <p>Canada Nickel will place a focus on regional and Indigenous employment when seeking to fill workforce requirements for construction and operation. Engagement with Apitipi Anicinapek</p>	Chapter 25, Sections 25.4.3 and 25.5.4. Chapters 7 and 23.

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	<p>Some Apitipi Anicinapek Nation members expressed support for the Project "if it's done right," with "done right" being described as the inclusion of job opportunities, education and training for members and supporting community businesses for present and future generations.</p> <p>Potential effects to economic benefits, investment and inclusion identified by Apitipi Anicinapek Nation include:</p> <ul style="list-style-type: none"> • Impacts (direct and indirect) the Project may have on local Indigenous businesses and economies, including potential business opportunities and partnerships. • Impacts to environmental conditions. • Impacts to the community health and well-being. 			<p>Nation helps Canada Nickel understand the needs of diverse population groups to help enhance employment opportunities through strategic, targeted programs.</p> <p>Through partnerships and discussions with regional training institutions, Canada Nickel hopes that training for the new workforce, per advice and program specifics of regional training institutions, will begin as appropriate on a case-by-case basis to meet anticipated employment opportunities.</p> <p>The following measures will be implemented by Canada Nickel to reduce potential adverse effects of the Project on economic conditions and inclusion:</p> <ul style="list-style-type: none"> • Canada Nickel will explore opportunities to support training, education, and scholarship programs that improve employment opportunities, including participation in and contribution to local training networks, which are targeted at diverse groups such as Indigenous Nations, local youth, and various relevant subgroups, such as the Indigenous Skills and Employment Training Program. • Canada Nickel will increase flexibility in work schedules to enable the continued participation of Indigenous employees in traditional and cultural activities. • Canada Nickel will develop a Diversity and Inclusion Policy, which encompasses respectful workplace behaviours for diverse groups such as Indigenous Nations, local youth, seniors, 2SLGBTQQIA+, visible minorities, persons with disabilities and members of the GBA Plus community. Such a policy and subsequent training consist of awareness training for non-Indigenous employees to foster a respectful working relationship with Indigenous employees and contractors. • Canada Nickel will participate in initiatives aimed at addressing inequality among Indigenous populations through working with organizations such as Keepers of the Circle. • Canada Nickel will prepare plans, programs and policies to encourage contracting and procurement opportunities for Indigenous businesses. Such plans will include the enhancement of supplier network development initiatives, including keeping a repository of local and Indigenous suppliers with potential to bid on the Project. Indigenous Nations located near the Project will be directly contacted regarding procurement opportunities from Canada Nickel and Canada Nickel will accommodate barriers there may be to bid on a contract (such as translation services), where feasible. • Canada Nickel commits to consider bids from qualified locally owned businesses first, including those submitted from diverse groups such as Indigenous-owned companies, women-owned companies, 2SLGBTQQIA+-owned companies, persons with disabilities-owned companies and visible minority-owned companies, as per Canada Nickel's Local Procurement Policy. • Canada Nickel has and will continue to engage local Indigenous Nations and has established agreements to support present engagement and participation in the Project. 	

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				<p>Canada Nickel will provide information about contracting and employment opportunities with Apitipi Anicinapek Nation, as well as obtain information regarding employment interests and the capacity and the capabilities of Apitipi Anicinapek Nation related to Project needs. Canada Nickel is committed to discussing potential economic participation in the Project to help build reciprocal business relationships with Apitipi Anicinapek Nation, including engaging contractors to uphold commitments to encourage participation of local Indigenous services on the Project, where possible.</p> <p>Canada Nickel is committed to maintaining an updated list of Indigenous businesses and their capacity and capabilities for the Project. This will be done through engagement with Apitipi Anicinapek Nation to collect, verify, and validate business information on an ongoing basis.</p> <p>Canada Nickel's Indigenous subcontracting, employment, and training expectations will be outlined through sourcing events (e.g., request for proposals). The majority of opportunities for contracting and employment will occur in the construction phase of the Project; however, Canada Nickel will seek to provide economic opportunities for local Indigenous communities throughout all phases of the Project, where possible.</p> <p>Regarding Apitipi Anicinapek Nation's concern specific to community health and well-being, additional information is provided in Row 3.</p> <p>The complete listing of mitigation measures applicable to economic conditions potentially affected by the Project is found in Chapter 23 of the Impact Statement and in Appendix E (Summary of Project Commitments).</p>	
5	<p><u>Hunting and Trapping, Wildlife and Wildlife Habitat</u></p> <p>Apitipi Anicinapek Nation stated that maintaining and protecting the current use of lands and resources for traditional purposes includes lands used for hunting and trapping, and its members' abilities to exercise their rights to hunt and trap. This is one of the First Nation's core values. Apitipi Anicinapek Nation reported country foods make up approximately 90% of some of its members diets.</p> <p>Traditional species of importance include, marten, beaver, fisher, mink, fox, grey fox, muskrat, squirrel, otter, weasel, rabbit, wolf, coyote, lynx, wolverine, black bear, and cougar, moose, boreal caribou, deer, white-tailed deer, geese, eagle (bald eagle), duck, grouse/partridge, crane, snowy owl, and osprey.</p> <p>Potential effects to hunting and trapping, wildlife and wildlife habitat identified by Apitipi Anicinapek Nation include:</p> <ul style="list-style-type: none"> • Changes to or loss of access to the land and loss of the right to harvest. • Effects to terrestrial wildlife species from Project activities and increased hunting. • Effects to moose and moose habitat, including calving sites, aquatic feeding areas, and wintering grounds. 	<p>PA, LSA, RSA</p> <p>Apitipi Anicinapek Nation identified two hunting and trapping areas that intersect with the PA:</p> <ul style="list-style-type: none"> • Kesagami caribou range • Along Highway 655 (hunting and trapping area) <p>An additional hunting area was identified 40.6 km northwest of the PA at Boundary Lake</p> <p>Six trapping and snaring areas, 23 change areas and 57 hunting areas were identified by Apitipi Anicinapek Nation at locations of 10 km or more from the PA, including areas for</p>	<p>Apitipi Anicinapek Nation recommends:</p> <ul style="list-style-type: none"> • Consultation with Apitipi Anicinapek Nation to identify animal species of cultural importance and areas used for traditional hunting. Further, Apitipi Anicinapek Nation expects that consultation in this regard will be conducted as soon as possible to facilitate the inclusion of these species as valued components in the Impact Statement. • Cumulative effects assessment on Indigenous Peoples and their Traditional Territories including on air quality, and wildlife, including caribou and moose. • Mitigation and monitoring measures to manage effects to wildlife and wildlife habitat from contamination, collisions, and effects on wildlife corridors and migration. • Additional baseline studies on species at risk, including recovery strategies or plans; the potential effects to species at risk and their habitat from Project activities, such as increased rail and road traffic, increased sensory disturbances, fragmentation of habitat due to new linear corridors and accidents and malfunctions; and the need for associated mitigation measures. • Additional baseline studies and recovery goals for the Kesagami caribou range. 	<p>Canada Nickel has provided engagement opportunities for Apitipi Anicinapek Nation relative to the Project, including the opportunity to identify wildlife species of cultural importance for consideration in the Impact Statement and for the development of an IBA related to Apitipi Anicinapek Nation harvesting rights. Additional information is provided in Row 1.</p> <p>The assessment of cumulative effects on Apitipi Anicinapek Nation interests, including changes to or loss of access to the land and loss of ability to exercise the right to harvest is provided in Chapter 25, Section 25.5.2.</p> <p>Baseline data for wildlife and wildlife habitats, and birds and bird habitats, were based on a review of background information from publicly available data sources, feedback and engagement with stakeholders, government and Indigenous Nations and site-specific field investigations completed between 2021 and 2023. This included, but was not limited to, surveys of amphibians, bats, moose, and boreal caribou, as well as several bird species, including Species at Risk and Species of Conservation Concern.</p> <p>Regarding Apitipi Anicinapek Nation's concerns for effects to moose and moose habitat, boreal caribou and its critical habitat, and other wildlife and wildlife habitat, Chapter 19 includes an assessment of effects on changes to wildlife and wildlife habitat, including changes in habitat, wildlife movement, mortality risk, health, and abundance and distribution. Key indicator species or wildlife groups selected to assess biodiversity and Project effects include amphibians and reptiles, moose, furbearers, species of conservation concern (midland painted turtle, snapping turtle, monarch and yellow-banded bumble bee) and species at risk (Blanding's turtle, boreal caribou and bats). This assessment is summarized in Chapter 25, Section 25.4.1. The following measures will be implemented by Canada Nickel to reduce potential adverse effects of the Project on wildlife and wildlife habitat:</p>	<p>Chapter 25, Sections 25.4 and 25.5.</p> <p>Chapters 19 and 22.</p>

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	<ul style="list-style-type: none"> • Effects to boreal caribou, its critical habitat, and the Kesagami caribou range. • Effects to high quality wildlife habitat in the PA especially between the Mattagami River and Frederick House River. • Contamination and degradation of wildlife resources due to herbicide spraying. • Effects to the Traplines known to be present in the PA. • Cumulative effects and the Projects contribution, specifically in the case of declining mammal and bird populations. • Distrust in the quality of wild foods (country foods) including meat in the area. • Declines in wildlife populations. • Increased instances of disease in wildlife, particularly in moose. • Loss of pristine landscapes and the displacement and poisoning of wildlife, which threaten traditional practices and the protection of the land for future generations. 	<p>hunting and trapping moose, partridge, American marten, fox, rabbit, lynx, river otter, squirrel and fisher.</p> <p>Apitipi Anicinapek Nation identified one Area of Ecological Significance (Wildlife habitat) within the PA</p> <p>An additional 83 mapped wildlife habitats and 1 migration route were identified by Apitipi Anicinapek Nation as Areas of Ecological Significance at locations 10 km or more from the PA, including snowy owl, moose, black bear, goose, duck, timber wolf, rabbit, beaver, muskrat, fox, partridge, coyote, eagle and osprey habitat.</p>	<ul style="list-style-type: none"> • Woodland caribou should be considered a valued component, considering its conservation status and cultural and ecological importance. • Funding for land-based programming that support traditional lifestyles, including hunting, fishing, and cultural education, particularly in response to potential changes in the availability of animals due to Project-related effects. • Designate and protect a portion of the PA as protected hunting and fishing areas for Apitipi Anicinapek Nation members, helping to preserve the local ecosystem and enable the community's ability to harvest animals safely. • Limit the spatial footprint of the Project and implement rigorous environmental monitoring to minimize damage to the ecosystem. 	<ul style="list-style-type: none"> • Canada Nickel will prepare and implement a Construction Environmental Protection Plan and Wildlife Management Plan, which will include tailored strategies for species and sensitive habitats that align with the principles of the "hierarchy of mitigation measures." Avoiding and restricting activities during sensitive and crucial timing windows will be prioritized, to the extent practical. • Canada Nickel will restrict clearing to the approved PA. • Canada Nickel will maintain vegetation cover along the boundaries of high-activity areas (e.g., access roads) to reduce sensory (noise and visual) disturbance, where practical. • Canada Nickel will consider wildlife friendly road and railway design principles and features, such as signage, adapting crossings (e.g., culverts) to allow small wildlife passage, speed limits, where relevant and practical. • Canada Nickel will implement measures to deter or exclude wildlife, where feasible. The specific measures and locations will be determined on a case-by-case scenario and will be monitored for effectiveness. • If wildlife is encountered, Project personnel will temporarily suspend activities until the species is out of harm's way. The encounter will be reported to Canada Nickel representative (e.g., environmental department). • Canada Nickel will incorporate mitigation measures into the design of the Project and will be included in the Construction Environmental Protection Plan and Wildlife Management Plan to avoid or reduce project-related effects on turtles, boreal caribou and bats. • Canada Nickel will implement measures in the Spill Prevention and Contingency Plan to prevent the release of harmful substances into waters or areas that could be accessed by wildlife. • Canada Nickel will develop a follow up and monitoring program focused on biodiversity that will be completed during all Project phases, including prior to construction and extending throughout construction and year one, year five, and every ten years during operations. <p>The Woodland Caribou Conservation Plan provides policy direction for the management and recovery of boreal caribou. This Project occurs within the Kesagami Range area and boreal caribou and their habitat are included in this assessment. Canada Nickel will incorporate the following mitigation measures as it relates to potential Project-related effects on boreal caribou:</p> <ul style="list-style-type: none"> • The Wildlife Management Plan will take into consideration Ontario's best management practices for mineral exploration and development activities and Woodland Caribou in Ontario. • Consideration will be given to the creation of boreal caribou habitat onsite as part of the Mine Development Closure Plan in conjunction with other priorities identified through engagement activities. • Obtain an Overall Benefit Permit under the Endangered Species Act, if required, for impacts to Category 3 habitat within the PA. Any permit conditions, including compensation requirements, timing windows, and setbacks, will be integrated into the appropriate management plan (e.g., Construction Environmental Protection Plan and Wildlife Management Plan). 	

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				<p>Regarding Apitipi Anicinapek Nation's concerns for increased competition, the following measures will be implemented by Canada Nickel to reduce potential adverse effects of the Project due to increased competition:</p> <p>Canada Nickel will prohibit Project personnel from hunting, fishing, and bringing firearms and fishing gear to the site while working to limit competition for wildlife and fish species. The complete listing of mitigation measures applicable to Wildlife and Wildlife Habitat potentially affected by the Project is found in Chapter 19 of the Impact Statement, and in Appendix E (Summary of Project Commitments).</p>	
6	<p><u>Water, Fishing, Fish and Fish Habitat:</u></p> <p>Apitipi Anicinapek Nation stated that maintaining and protecting the current use of lands and resources for traditional purposes includes waters used for fishing and the ability to exercise rights to fish; this is one of the First Nation's core values.</p> <p>Traditional species of importance include bait fish, sauger, sea trout, bass (large and smallmouth), mooneye, sheepshead, goldeye, splake, pike, northern pike/jackfish, sucker (white and redhorse), brook trout, burbot, perch, catfish (channel and brown bullhead), lake sturgeon, pickerel/walleye, lake trout, muskie and lake whitefish.</p> <p>Potential effects to water, fishing, fish and fish habitat identified by Apitipi Anicinapek Nation include:</p> <ul style="list-style-type: none"> Habitat loss and overprinting of tributaries of the North Driftwood and West Buskegau Rivers. Changes to water quality and quantity due to the overprinting of tributaries to the North Driftwood River, West Buskegau River, and Jocko Creek, which feed into the Abitibi River. Location of the tailings management facility near the headwaters of the North Driftwood River and West Buskegau River, which feed into the Abitibi River. Effects to water quality and quantity, including contamination from discharge, runoff, or seepage from water-crossings, waste rock stockpiles, ore stockpiles, overburden stockpiles, and the tailings management facility. Effects to water quantity and associated risks of mercury mobilization. Methylmercury accumulation and trophic level interactions. Loss of natural waterbodies. Changes to groundwater-surface water interactions. Effects related to blasting in or near fish and fish habitat and spawning sites and impacts related to fish relocation. 	<p>PA, LSA, RSA</p> <p>Apitipi Anicinapek Nation identified the following water, fishing, fish and fish habitat areas. The following locations intersect with the PA:</p> <ul style="list-style-type: none"> West Buskegau River (fish habitat) North Driftwood River (fish habitat) Jocko Creek (sturgeon habitat) <p>The remaining locations were located at distances:</p> <ul style="list-style-type: none"> 5.7 km west of the PA at the Mattagami River (fishing area) 5.9 km east of the PA at the Buskegau River (fishing area) 13.6 km southeast of the PA at Little Goose Lake (fishing area) 26.3 km east of the PA at the Frederick House River (fishing area) 	<p>Apitipi Anicinapek Nation recommends:</p> <ul style="list-style-type: none"> Cumulative effects assessment on Indigenous Peoples and their Traditional Territories including water quantity, and water quality. Alternative means to reduce habitat loss and overprinting of tributaries of the North Driftwood and West Buskegau Rivers. Defined spatial and temporal boundaries, including the spatial extent of Project effects on the aquatic environment, and a temporal scope that is inclusive of historical activities and legacy effects. Consultation with Apitipi Anicinapek Nation to identify fish species of cultural importance and areas used for traditional fishing. Further, Apitipi Anicinapek Nation expects that consultation in this regard will be conducted as soon as possible to facilitate the inclusion of these species as valued components in the Impact Statement. The Impact Statement should delineate the spatial extent of the direct and indirect effects of the Project on the aquatic environment. Consideration of lake sturgeon as a potential valued component in the Impact Statement if the Project interacts with Jocko Creek. Participation in ongoing monitoring of surface water flow impacts to the Abitibi River. Alternative means and mitigation for waste rock, effluent discharge, including site selection, tailings management, and ore processing location. Stringent environmental management and protection measures throughout the lifecycle of the Project, including protection of fish, wildlife and water. Protecting water quality and ensuring it remains safe for drinking. 	<p>Regarding Apitipi Anicinapek Nation's recommendation for consultation with Apitipi Anicinapek Nation to identify fish species of cultural importance, information regarding engagement and agreements signed between Canada Nickel and Apitipi Anicinapek Nation to support the identification of fish species of cultural importance, as well as Canada Nickel's commitment to follow-up with Apitipi Anicinapek Nation regarding their request for involvement in monitoring are provided in Row 1 of this table.</p> <p>Potential effects on fish species of cultural importance to Apitipi Anicinapek Nation were assessed in Chapters 17 and 21 and summarized in Chapter 25 (Sections 25.4.1 and 25.5.2).</p> <p>Potential effects on water quality and quantity relative to Apitipi Anicinapek Nation interests was assessed in Chapters 14 and 15 and summarized Chapter 25 (Sections 25.4.1 and 25.5.2).</p> <p>The assessment of cumulative effects on Apitipi Anicinapek Nation interests, including changes to or loss of access to the land and loss of ability to exercise the right to harvest is provided in Chapter 25 (Section 25.5.2). The assessment also considers cumulative effects on surface water and ground water quality and quantity, and fish and fish habitat. Additional information is provided in Chapter 29.</p> <p>Assessment boundaries (spatial and temporal) are specific to each valued component and are provided in each applicable chapter of the Impact Statement.</p> <p>Regarding Apitipi Anicinapek Nation's concerns for changes to water quality and quantity, the following measures will be implemented by Canada Nickel to reduce potential adverse effects of the Project on water:</p> <ul style="list-style-type: none"> Limit construction footprint (i.e., PA) to the extent possible to reduce the potential for reductions in groundwater recharge, and limit the number of watersheds overprinted by the PA. Use standard construction methods, such as seepage cutoff collars, where trenches extend below the water table to mitigate preferential flow paths. Design of the Stockpiles and Impoundment Facility to increase the amount of runoff and reduce the amount of infiltration, thereby reducing the seepage and loading to groundwater. Implementation of progressive rehabilitation (placement of vegetated soil cover) to reduce infiltration into the Impoundment Facility and Tailings Management Facility, thereby reducing the amount of water and loading to groundwater and improvements to groundwater quality. If faults or fractures which act as conduits for increased flow of groundwater are encountered during advancement of the Open Pit, Canada Nickel will evaluate potential impacts from the 	<p>Chapter 25, Sections 25.4 and 25.5.</p> <p>Chapters 3, 9, 10, 14, 15, 17, 21 and 29.</p>

Row No.	Apitipi Anicinapek Nation's Perspectives and Concerns	Approximate Location Relative to Project	Apitipi Anicinapek Nation's Recommendations	Canada Nickel / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
	<ul style="list-style-type: none"> • Effects to lake sturgeon due to effluent. • Discharge in the Mattagami River and noise and vibrations from blasting. • Effects to lake sturgeon in Jocko Creek. • Impacts to human health, including actual and perceived risks at key receptors due to changes recreational and drinking water quality. • Effects to potable water sources and water intake at Smooth Rock Falls. • Contamination and degradation of aquatic resources. • Sturgeon fishing in the Mattagami River and confluence of the Buskegau and Frederick House River. • Cumulative effects and the Projects contribution, specifically in the case of declining fish populations and water quality and quantity. • The number of hydro dams in Apitipi Anicinapek Nation's Territory and the potential impacts of flooding, water flow and fluctuation and eutrophication and algal blooms. • Increased instances of disease in wildlife, particularly in fish. • Potential for sulphate leaching into groundwater. 	<ul style="list-style-type: none"> • 28.0 km northeast of the PA at Dunn's Lake (fishing area) • 31.3 km north of the PA at the interchange of Highway 11 and Highway 655 (fishing area) • 4.0 km west of the Project (Mattagami River [important waterway]) • 36.5 km northeast of the Project (Abitibi River [important waterway]) • 41.3 km northwest of the Project (Smooth Rock Falls [water source]) <p>Thirty-six fishing areas were identified by Apitipi Anicinapek Nation at locations of 10 km or more from the PA.</p> <p>An additional 21 fish habitats and 6 spring water sites were identified by Apitipi Anicinapek Nation as Areas of Ecological Significance at locations 10 km or more from the PA, including fish spawning and sturgeon habitat.</p>	<ul style="list-style-type: none"> • Continued engagement on water management plans, including site visits and transparent information sharing. 	<p>increased flows and, if necessary, implement grouting or other practical measures to reduce groundwater inflow</p> <ul style="list-style-type: none"> • Prepare an Emergency Preparedness and Response Plan and a Spill Prevention and Contingency Plan which will describe spill prevention, contingency planning and reporting practices for the timely and effective response to fuel and other chemical spills. • Install contact water collection ditches around the Stockpiles, Impoundment Facility, and Tailings Management Facility to collect toe seepage and groundwater recharge from these Project components. • Implement progressive rehabilitation (placement of a vegetated soil cover) to reduce infiltration into the Impoundment Facility and Tailings Management Facility, thereby reducing the amount of water and loading to groundwater and improvements to groundwater quality • Develop and implement a Metal Leaching and Acid Rock Drainage Management Plan to reduce and limit the known and potential risks of ML/ARD associated with the Project, thereby reducing potential effects to water quality. • Monitoring wells upgradient, cross gradient, and downgradient of the Stockpiles will be established to collect groundwater levels and water quality during construction and operations to document changes to groundwater levels and flow and groundwater quality. • A representative subset of monitoring wells will be instrumented with data loggers to collect regular groundwater levels. Groundwater levels will be manually measured, and data loggers download in spring, summer, and fall, as possible. • Groundwater quality samples from monitoring wells will be monitored in spring, summer, and fall, as possible, during construction, operations and decommissioning and closure with the frequency progressively reduced based on monitoring results and Project phase. Winter groundwater sampling is not feasible as, based on the baseline data, the monitoring wells are generally frozen and not possible to sample. Groundwater quality samples will be analyzed for general chemistry and select dissolved metals. • Water discharges to the North Driftwood River and West Buskegau River will be balanced to the extent feasible to maintain watercourse flows. • Canada Nickel will design the seepage collection ditches to intercept shallow groundwater seepage from the Tailings Management Facility, ore Stockpiles and Impoundment Facility. • Canada Nickel will implement water treatment through use of a water treatment plant to received discharge from the Tailings Management Facility, collection ponds, and will use proven processes to treat the water to meet regulatory effluent criteria prior to discharge to the environment. • Canada Nickel will verify the adequacy and effectiveness of mitigation measures for surface water quantity and quality through implementation of a follow-up and monitoring program. <p>Regarding Apitipi Anicinapek Nation's concerns for effects to fish, fishing and fish habitat, Chapter 9 contains an assessment of existing conditions for fish and fish habitat, which were informed from a desktop review of existing reports, provincial and federal datasets, Indigenous Knowledge provided by Indigenous Nations, and a three-year field program conducted between</p>	

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				<p>2021 and 2023. Additional sampling was also completed in the North Driftwood and West Buskegau Rivers in spring 2024 for the Fish and Fish Habitat Baseline report.</p> <p>As described in Chapter 17, lake sturgeon was identified as a species of cultural importance to Indigenous Nations, and it was included as a focal fish species in the assessment of effects on Fish and Fish Habitat.</p> <p>A summary of potential residual and cumulative effects to fish and fish habitat was provided in Chapter 25 (Section 25.4.1 and 25.5.2).</p> <p>The following measures will be implemented by Canada Nickel to reduce potential adverse effects of the Project on fishing, fish and fish habitat:</p> <ul style="list-style-type: none"> • Canada Nickel will limit the construction footprint (i.e., PA) to the extent possible to limit the number of subwatersheds overprinted by the PA and to avoid larger watercourses (e.g. the West Buskegau River) and lakes (e.g. Martin Lake). • Canada Nickel will progressively reclaim mine infrastructure to reduce erosion and sediment loading to streams. • Canada Nickel will implement fish habitat compensation measures for unavoidable harm to fish habitat to satisfy requirements under the <i>Fisheries Act</i> to offset serious harm caused by Project-related activities. • Canada Nickel will apply natural channel design principles to appropriately design and dimension the North Driftwood Diversion Channel. • Canada Nickel will implement a no-fishing policy in watercourses and waterbodies within or adjacent to the PA by all Project personnel while on-shift. • Canada Nickel will develop an Explosives Management Plan which will describe the safe use and storage of explosives and explosive components at the Project site. This plan will consider the Guidelines for Use of Explosives In or Near Canadian Fisheries Waters. • Canada Nickel will verify the adequacy and effectiveness of mitigation measures for changes to fish habitat and fish health, growth and survival, through the implementation of a follow-up and monitoring program. • If an unexpected deterioration of the environment is observed as part of follow-up and/or monitoring, Canada Nickel will employ intervention mechanisms which will include the adaptive management process. This will include an investigation of the cause of the deterioration and identification of existing and/or new mitigation measures to be implemented to address it, if needed. <p>Regarding Apitipi Anicinapek Nation's recommendation for alternative means and mitigations for waste rock, effluent discharge, and protection of water quality, Canada Nickel prepared a Conceptual Closure Plan to provide the rehabilitation measures to be implemented during closure for the purposes of fully evaluating the potential effects and necessary mitigation and monitoring measures for the Project and to provide the basis for future planning and design updates.</p> <p>The Project will utilize two Ore Stockpiles located east and west of the Open Pit, and an impoundment facility (including rock impoundment, sand and till impoundment, and clay</p>	

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				<p>impoundment) to the north of the Open Pit. The Tailings Management Facility will be located to the south and will be progressively raised as the volume of the tailings increases.</p> <p>Hydrologic modelling is being completed to predict the time to fill the pit lake and the ultimate discharge rate from the pit lake rate at the East and West spillways. Preliminary hydrological modelling suggests greater than 100 years for the Open Pit to fill to the design elevation of 272.5 m above mean sea level. Water quality modelling of the pit lake is being completed to assess water quality and will consider inputs to the Open Pit from atmospheric precipitation, runoff from rock and ore exposed on pit walls, groundwater inflows, and interactions of the pit lake water with the tailings used to backfill the Open Pit.</p> <p>The tailings placed in the Open Pit and the pit wall rock are predicted to be not potentially acid generating. Preliminary metal leaching rates are predicted to result in runoff and seepage quality that meets the Provincial Water Quality Objectives. Based on existing geochemistry data, no further water treatment is anticipated in closure. Two passive spillway channels are expected to be constructed to connect the open pit to natural, adjacent waterbodies once water quality is stable and meets the criteria for discharge.</p> <p>The water quality from the Impoundment Facility and Tailings Management Facility, and pit lake have been predicted using a site wide water balance and water quality model. The modelling approach incorporates conservative assumptions to support the assessment of potential effects for the Impact Statement. As the project progresses modeling will be updated, contingency measures (potentially including passive treatment systems such as wetland treatment) will be identified based on those updates.</p> <p>Filling of the pit will commence during Project operations. During operations, Open Pit groundwater and surface runoff from haul roads and the pits will be pumped to the Tailings Management Facility Northwest and Northeast Collection Ponds. As per mining best practice, perimeter collection ditching will be constructed to intercept shallow groundwater seepage at the toe of stockpiles and dams. Non-contact water will be diverted around mine infrastructure to reduce the amount of water needing to be managed and to maintain existing flow to the adjacent watercourses to the extent possible. Effluent will be treated prior to discharge to the receiving environment, as required, to meet regulatory effluent criteria as well as criteria developed through the receiving watercourse Assimilative Capacity Assessment. A water treatment plant will receive discharge from the tailings pond and use proven processes to treat the water to meet regulatory effluent criteria prior to discharge to the environment.</p> <p>A detailed Site-Wide Water Balance Summary Report (Appendix I) and Site-Wide Water Management Plan (Appendix J) have been developed. Additional information is provided in the Conceptual Closure Plan (Appendix F) of the Impact Statement.</p> <p>In addition, the following measures will be implemented by Canada Nickel to reduce potential adverse effects of the Project from waste rock:</p> <ul style="list-style-type: none"> • Apply best management practices to promote terrain stability via recontouring, terracing or benching and maintaining slope gradients for all excavated areas and stockpiled materials through the duration of the Project for construction activities. • At closure, Canada Nickel will conduct a slope stability assessment to demonstrate the long-term physical stability of the Open Pit and the Impoundment Facility. For the TMF embankments, Canada Nickel will demonstrate that the requirements set out by the Global 	

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				<p>Industry Standard on Tailings Management or and Canadian Dam Association (CDA) guidelines for long-term care are met.</p> <p>Regarding Apitipi Anicinapek Nation's concern for contamination from discharge, Canada Nickel performed a geochemical assessment on waste rock, ore samples, tailings samples, and overburden samples. As described in Chapter 15, a list of Parameters of Potential Concern (e.g., chloride, fluoride, nitrate, arsenic, etc.) were established to determine the daily and monthly limits of effluent discharge according to regulatory guidelines and the Project's residual and cumulative effects of surface water quality as a result.</p> <p>Regarding Apitipi Anicinapek Nation's concern for effects related to blasting in or near fish and fish habitat, additional information is provided in Row 1.</p> <p>Regarding Apitipi Anicinapek Nation's concern for contamination of groundwater and aquatic resources, additional information is provided above in Row 3.</p> <p>Canada Nickel will continue to engage Apitipi Anicinapek Nation to seek its recommendations regarding sites that should be considered for conservation and reclamation efforts.</p> <p>The complete listing of mitigation measures is provided in Appendix E (Summary of Project Commitments).</p>	
7	<p><u>Vegetation and Plant Gathering</u></p> <p>Apitipi Anicinapek Nation stated that maintaining and protecting the current use of lands and resources for traditional purposes includes lands used for plant and medicine harvesting and ability to exercise rights to harvest plants.</p> <p>Traditional species of importance include moss, cedar, fungi, reindeer lichen, blueberries, raspberries, gooseberries, Labrador tea, tamarack, mushrooms.</p> <p>Potential effects to vegetation and harvesting identified by Apitipi Anicinapek Nation include:</p> <ul style="list-style-type: none"> • Effects to muskeg and unevaluated wetlands in the PA. • Impacts to natural carbon sequestration, and from forest fragmentation and contamination of vegetation from fugitive dust, metals, and nitrogen from explosives. • Invasive plant management and revegetation methodology, and residual effects. • Contamination and degradation of plant resources. • Cumulative effects of forest clearing. 	<p>PA, LSA, RSA</p> <p>Twenty-nine gathering areas and 7 harvesting areas were identified by Apitipi Anicinapek Nation at locations 10 km or more from the PA, including areas for gathering blueberries, raspberries, chaga and tamarack.</p>	<p>Apitipi Anicinapek Nation recommends:</p> <ul style="list-style-type: none"> • Cumulative effects assessment on Indigenous Peoples and their Traditional Territories including the effects on plants. • More information on plant species found onsite, specifically plants used as medicines or country foods. • Consultation with Apitipi Anicinapek Nation to identify plant species of cultural importance. Further, the Nation expects that engagement in this regard will be conducted as soon as possible to facilitate the inclusion of these species as valued components in the Impact Statement. 	<p>Canada Nickel has provided engagement opportunities for Apitipi Anicinapek Nation relative to the Project, including the opportunity to identify plant species of cultural importance for consideration in the Impact Statement. Additional information is provided in Row 1 of this table.</p> <p>Potential effects on plant species of cultural importance to Indigenous Nations, including those used as medicines or country foods, were assessed in Chapters 16 and 21 and summarized in Chapter 25 (Section 25.4.1).</p> <p>The assessment of cumulative effects on Apitipi Anicinapek Nation interests, including plants present in its Traditional Territory, is provided in Chapter 25 (Section 25.5.2). The assessment of cumulative effects on Vegetation, Riparian and Wetland Environments is provided in Chapter 29. Regarding Apitipi Anicinapek Nation's concerns for effects to muskeg and unevaluated wetlands in the PA, forest fragmentation and contamination and degradation of plant resources, the following measures will be implemented by Canada Nickel to reduce potential adverse effects of the Project on vegetation, wetlands and plant gathering:</p> <ul style="list-style-type: none"> • Canada Nickel will notify and work with Indigenous Nations who have expressed an interest in harvesting plants within the PA before construction to provide safe access for these activities, prior to any clearing occurring. • Canada Nickel will mark clearing boundaries prior to site preparation to maintain clearing activities within the designated footprint. Restrict clearing to the approved PA. • Implement industry-standard management practices to reduce and control the introduction or spread of invasive plants and noxious weeds, such as development of a clean equipment protocol. Progressively revegetate disturbed areas in the PA to reduce the potential for colonization of disturbed areas by invasive plant species. Where invasive plant species are discovered within the Project Area, Canada Nickel will implement vegetation control to eliminate the occurrence and prevent further spread. Use only native Ontario species and nurse crops when conducting progressive reclamation. 	<p>Chapter 25, Sections 25.4.1 and 25.5.2.</p> <p>Chapters 16, 21 and 29.</p>

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				<ul style="list-style-type: none"> • Incorporate plant species at risk (SAR) and species of conservation concern (SOCC) in reclamation planting activities planning, if and where habitat is deemed suitable. • Incorporate plant species of importance to Indigenous Nations into progressive reclamation and planting associated with decommissioning and closure of the site. • Avoid or reduce vegetation clearing activities within identified areas of plant species of management concern (SOMC) within the Project Area (if present), where practical. • Incorporate rare vegetation communities into reclamation planning for progressive reclamation and eventual decommissioning and closure of the site where appropriate and feasible. • When crossing watercourses and wetlands that will be preserved over the Project duration with linear features such as roads, Canada Nickel will maintain hydrological connectivity using appropriately sized culverts to reduce impacts on riparian vegetation. • Incorporate wetlands into reclamation planning to re-establish wetlands, where practical. Canada Nickel will undertake vegetation test plots to identify suitable reclamation options. <p>The complete listing of mitigation measures is provided in Appendix E (Summary of Project Commitments).</p>	

Note:

¹ The complete listing of mitigation measures is provided in Appendix E (Summary of Project Commitments).

SOURCES:

Feedback obtained through Canada Nickel Project-specific engagement with Apitipi Anicinapek Nation. Refer to Chapter 7 of the Impact Statement for additional details.

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