

Crawford Nickel Project Impact Statement

Chapter 28 Assessment of Potential Effects on the Métis
Nation of Ontario – Region 3 Interests



Prepared for:
Canada Nickel Company

Prepared by:
Stantec Consulting Ltd.

November 22, 2024

Table of Contents

28	Assessment of Potential Effects on the Métis Nation of Ontario – Region 3 Interests	28.1
28.1	Scope of Assessment	28.1
28.1.1	Regulatory Context and Policy Setting	28.2
28.1.2	Influence of Engagement on the Assessment	28.3
28.1.3	Indigenous Knowledge	28.3
28.1.4	Methods for Establishing Existing Conditions	28.4
28.1.5	Potential Effects, Pathways and Measurable Parameters	28.5
28.1.6	Boundaries	28.10
28.1.7	Residual Effects Characterization	28.14
28.1.8	Mitigation Measures	28.16
28.1.9	Analytical Assessment Techniques	28.16
28.1.10	Significance of Adverse Federal Effects Characterization	28.17
28.2	Existing Conditions	28.18
28.2.1	Rights, Governance and Legal Characteristics	28.18
28.2.2	Population and Demographics	28.21
28.2.3	Social Conditions and Services	28.22
28.2.4	Health	28.22
28.2.5	Economic Characteristics	28.23
28.2.6	Exercised or Practiced Indigenous and Métis Rights	28.24
28.2.7	Cultural Heritage	28.30
28.3	Project Interactions	28.32
28.4	Assessment of Residual Effects	28.35
28.4.1	Change to the Métis Nation of Ontario - Region 3's Indigenous Rights Project Pathways	28.35
28.4.2	Change in the Métis Nation of Ontario - Region 3's Physical and Cultural Heritage	28.43
28.4.3	Change to Governance, Health, Social and Economic Conditions of the Métis Nation of Ontario - Region 3	28.46
28.4.4	Summary of Project Residual Effects	28.54
28.5	Assessment of Cumulative Effects	28.58
28.5.1	Residual Project Effects Likely to Interact Cumulatively	28.60
28.5.2	Change to the Métis Nation of Ontario - Region 3's Indigenous Rights	28.61
28.5.3	Change in the Métis Nation of Ontario - Region 3's Physical and Cultural Heritage	28.64
28.5.4	Change to Governance, Health, Social and Economic Conditions of the Métis Nation of Ontario - Region 3	28.66
28.5.5	Cumulative Effects Without the Project	28.69
28.5.6	Summary of Cumulative Effects	28.70
28.6	Extent of Significance and Prediction Confidence	28.72
28.7	Assumptions	28.75
28.8	Follow-up and Monitoring	28.76
28.9	Potential Effects on Federal Lands	28.77
28.10	References	28.77
28.11	Figures	28.82

List of Tables

Table 28.1	Potential Effects, Effects Pathways, and Measurable Parameters for Indigenous Interests.....	28.7
Table 28.2	Characterization of Residual Effects on Indigenous Interests.....	28.14
Table 28.3	Project Interactions with Indigenous Interests – The Métis Nation of Ontario - Region 3	28.32
Table 28.4	Project Residual Effects on the Métis Nation of Ontario - Region 3’s Interests	28.54
Table 28.5	Interactions with the Potential to Contribute to Cumulative Effects to the Métis Nation of Ontario - Region 3’s Rights and Interests.....	28.60
Table 28.6	Residual Cumulative Effects.....	28.70

List of Figures

Figure 28.1	Indigenous Interests Assessment Areas – The Métis Nation of Ontario - Region 3	28.83
Figure 28.2	Waterbodies and Watercourses	28.84
Figure 28.3	Archaeological Potential	28.85

List of Attachments

Attachment 28.1	The Métis Nation of Ontario - Region 3 Engagement Outcomes for the Crawford Nickel Project (the Project)
-----------------	--

Acronyms and Abbreviations

AQMP	Air Quality Management Plan
CEPP	Construction Environmental Protection Plan
CDSSAB	Cochrane District Social Services Administration Board
CHSR	Cultural Heritage Screening Report
CoPCs	Contaminants of Potential Concern
CO ₂ e	Carbon Dioxide Equivalent
CVHI	Cultural heritage value or interest
DFO	Fisheries and Oceans Canada
ECEs	Early childhood educators
EPRP	Emergency Preparedness and Response Plan
FPIC	Free, Prior and Informed Consent
FTEs	Full-time equivalents
GIS	Geographic Information System
GoC	Government of Canada
GovOnt	Government of Ontario
HBC	Hudson’s Bay Company
HMSP	Health and Medical Services Plan
IAA	<i>Impact Assessment Act</i>
IAAC	Impact Assessment Agency of Canada
km	Kilometre
kt	Kilotonnes
LSA	Local Study Area

Crawford Nickel Project Impact Statement

Acronyms and Abbreviations - Chapter 28 Assessment of Potential Effects on the Métis Nation of Ontario – Region 3 Interests

November 22, 2024

MCM	Ontario Ministry of Citizenship and Multiculturalism
MMB	Modelled Mine Boundary
MMIWG	Missing and Murdered Indigenous Women and Girls
MNR	Ministry of Natural Resources
MNO	Métis Nation of Ontario
n.d.	No date
NORCAT	The Northern Centre for Advanced Technology
OAHS	Ontario Aboriginal Housing Services
PA	Project Area
PIN	Property Identification Number
PM	Particulate Matter
RHO	Regional Historical Overview
PCMNO	Provisional Council of the Métis Nation of Ontario
RSA	Regional Study Area
SCC	Supreme Court of Canada
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
UN	United Nations

Crawford Nickel Project Impact Statement

**Acronyms and Abbreviations - Chapter 28 Assessment of Potential Effects on the Métis Nation of Ontario –
Region 3 Interests**

November 22, 2024

UNDRIP	United Nations Declaration on the Rights of Indigenous Peoples
VC	Valued Component
2SLGBTQQA+	Two-Spirit, Lesbian, Gay, Bisexual, Transgender, Queer, Questioning, Intersex, Asexual, and all other sexual orientations and genders

28 Assessment of Potential Effects on the Métis Nation of Ontario – Region 3 Interests

Canada Nickel Company (Canada Nickel) is proposing to construct the Crawford Nickel Project (the Project). The Project is within the Métis Nation of Ontario - Region 3 area of interest.

The Impact Assessment Agency of Canada (IAAC) intends to consult with the Métis Nation of Ontario – Region 3 to understand the concerns and potential effects of the Project on their exercise of potential or established Indigenous 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 the Métis Nation of Ontario - Region 3.

This chapter presents information on Canada Nickel’s understanding of how the Project may affect the Métis Nation of Ontario - Region 3’s interests. The assessment of potential Project effects (both adverse and positive) on the Métis Nation of Ontario - Region 3’s interests include consideration of impacts to Indigenous rights recognized and affirmed by section 35 of the *Constitution Act, 1982* as well as other interests identified by the Métis Nation of Ontario - Region 3. Canada Nickel understands that the Indigenous 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 the Métis Nation of Ontario - Region 3. Of note, as an impact assessment is not a rights determination process, it is not intended to define or delimit established or asserted rights of the Métis Nation of Ontario - Region 3.

28.1 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 rights in accordance with the federal and provincial requirements for the Project,⁴ and as informed by the Métis Nation of Ontario - Region 3.

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 Indian, 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
- 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 rights exercised within the area of the Project is guided by the findings of the Supreme Court of Canada (SCC), publicly available literature, and the perspectives of the Métis Nation of Ontario - Region 3.

Canada Nickel will continue to respond to questions and concerns from the Métis Nation of Ontario - Region 3 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.

28.1.1 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 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 for the Project and Indigenous Engagement and Partnership Plan for the Project.

This assessment also considers the following relevant regional, national, and international declarations, polices, 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/or areas of interest, and natural resources.

28.1.2 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 the Métis Nation of Ontario - Region 3 is found throughout this chapter and is compiled in Attachment 28.1. Attachment 28.1 also provides Canada Nickel's responses and proposed mitigation measures for the concerns and recommendations made by the Métis Nation of Ontario - Region 3.

28.1.3 Indigenous Knowledge

The Indigenous Knowledge that Canada Nickel has identified through engagement with the Métis Nation of Ontario - Region 3 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 the Métis Nation of Ontario - Region 3 (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 the Métis Nation of Ontario - Region 3. Through engagement activities, the Métis Nation of Ontario - Region 3 has been requested to provide feedback with respect to

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

potential impacts of the Project on their rights and interests and has been provided the opportunity to validate this section of the assessment.⁶ The outcomes of this engagement available at the time of writing are incorporated into the assessment below.

The Métis Nation of Ontario - Region 3 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 from the Métis Nation of Ontario - Region 3 the following studies that have been reviewed and incorporated into this assessment:

- Métis Nation of Ontario - Region 3 Impact Study: Crawford Nickel Mine Project (MNO 2024).⁷

Where made available by the Métis Nation of Ontario - Region 3 through engagement, information gathering, and voluntary information sharing, Indigenous Knowledge has been reviewed and incorporated into the Impact Statement, as applicable. Canada Nickel will continue to engage with the Métis Nation of Ontario - Region 3 and will consider information provided by the Métis Nation of Ontario - Region 3 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.

28.1.4 Methods for Establishing Existing Conditions

Section 35 of the *Constitution Act*, 1982 recognizes and affirms existing Indigenous rights of the First Nation, Inuit, and Métis peoples of Canada (SCC 1990, 1996, 2016). 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 the Métis Nation of Ontario - Region 3 holds claim to asserted or established Indigenous rights in the area of the Project. By adopting a recognition-based approach informed by the regulatory and policy setting described in Section 28.1.1, this assessment includes consideration for all effects to interests or matters of importance identified by the Métis Nation of Ontario - Region 3.

A literature review was conducted to provide an overview of existing publicly available information for the Métis Nation of Ontario - Region 3. The literature review focused on information related to rights of the Indigenous Peoples, Indigenous land and resource use, and the interests identified by the Métis Nation of Ontario - Region 3, including the way those rights are exercised or practiced as described by the Métis Nation of Ontario - Region 3. The literature review considered information from the following sources:

- Publicly available studies previously completed by the Métis Nation of Ontario - Region 3 for other developments

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

⁷ The report (MNO 2024) has been provided to Canada Nickel by the Métis Nation of Ontario - Region 3 for consideration by the Crown and Canada Nickel in the Project regulatory process. Canada Nickel acknowledges that the information contained in the report remains the property of the Métis Nation of Ontario - Region 3 and may not be used for any other purpose without the express consent of the Métis Nation of Ontario - Region 3. For further information regarding the terms of use of the report (MNO 2024), contact the Métis Nation of Ontario - Region 3 and Canada Nickel.

- 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., the Métis Nation of Ontario - Region 3 websites)

Information was drawn from sources relevant to the location of the Project and to the Métis Nation of Ontario - Region 3.

As part of ongoing engagement with Canada Nickel, the results of the literature review, including source information, were shared with the Métis Nation of Ontario - Region 3. The Métis Nation of Ontario - Region 3 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 the Métis Nation of Ontario - Region 3.

Existing conditions specific to the Métis Nation of Ontario - Region 3 are described in Section 28.2.

28.1.5 Potential Effects, Pathways and Measurable Parameters

A preliminary list of three representative Indigenous interests was identified for this assessment through engagement with the Métis Nation of Ontario - Region 3, a review of issues and concerns about the Project raised by the Métis Nation of Ontario - Region 3 (Attachment 28.1), 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 28.1.1). The preliminary list of potential effects on Indigenous interests is:

- Change to the Métis Nation of Ontario - Region 3 Indigenous Rights (including Indigenous lands and resource use)
- Change to the Métis Nation of Ontario - Region 3 Physical and Cultural Heritage
- Change to governance, Health, Social and Economic Conditions of the Métis Nation of Ontario - Region 3

⁸ See Chapter 7 Description of Engagement with Indigenous Peoples.

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 areas of interest (as defined in Section 28.2).

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 the Métis Nation of Ontario - Region 3, the results of other assessments for relevant VC, and professional judgment.

The Indigenous 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 rights are intricately linked and influenced by environmental conditions, as well as the Métis Nation of Ontario - Region 3's culture, history, protocols, health, and wellbeing. To facilitate assessment, Table 28.1 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 the Métis Nation of Ontario - Region 3 shared with Canada Nickel. Departures from the potential effects identified in Table 28.1, if any, are described in the Nation-specific assessments that follow, as informed by Canada Nickel's engagement with the Métis Nation of Ontario - Region 3.

Table 28.1 Potential Effects, Effects Pathways, and Measurable Parameters for Indigenous Interests

Potential Effect	Effect Pathway	Measurable Parameter(s) and Units of Measurement
Change to the Métis Nation of Ontario - Region 3's Indigenous 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 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 citizens • Other changes or concerns raised by the Métis Nation of Ontario - Region 3

Potential Effect	Effect Pathway	Measurable Parameter(s) and Units of Measurement
<p>Change in the Métis Nation of Ontario - Region 3's Physical and Cultural Heritage⁹</p>	<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 citizens • Other changes or concerns raised by the Métis Nation of Ontario - Region 3

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
<p>Change to Governance, Health, Social and Economic Conditions of the Métis Nation of Ontario - Region 3</p>	<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 • 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"> • 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 • 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 citizens • Other changes or concerns raised by the Métis Nation of Ontario - Region 3

28.1.6 Boundaries

28.1.6.1 Spatial Boundaries

The assessment areas are defined by spatial boundaries that consider the geographic extent over which Project activities may affect the Métis Nation of Ontario - Region 3 and are illustrated in Figure 28.1 and Figure 28.2

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 28.1 to Figure 28.2.
- **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 28.1 to Figure 28.2) 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 Indigenous Interests 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 28.1 to Figure 28.2). 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:

- **The Métis Nation of Ontario – Region 3 Area of Interest:** Includes areas used by the Métis Nation of Ontario for sustenance, social, economic and ceremonial purposes. There is no unique land base administered or serviced by the Métis Nation Ontario. Based on review of publicly available information, it has been determined that the Métis Nation of Ontario – Region 3’s area of interest may be encompassed within the identified Project assessment areas (Indigenous Interests LSA and RSA) overlapping or in the vicinity of the PA. This spatial area is considered for the assessment of effects on the Métis Nation of Ontario – Region 3 (Sections 28.4 and 28.5).

The PA, Indigenous Interests LSA and RSA intersects with and is located within the Métis Nation of Ontario - Region 3 and is specific to the Abitibi Inland Historic Métis Community’s area of interest (MNO 2024).

As noted, the spatial boundaries selected for the Impact Statement do not preclude the consideration of potential Project interactions with broader 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 the Métis Nation of Ontario - Region 3, Canada Nickel will evaluate potential interactions in the context of the Project and the Impact Statement.

Departures from the spatial boundaries, if any, are described in the Nation-specific assessments that follow, as informed by Canada Nickel’s engagement with the Métis Nation of Ontario - Region 3.

28.1.6.2 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.

¹⁰ See Chapters 10 to 24.

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 3 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 60kt/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 of 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 28.3.¹¹

28.1.7 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 28.2 is informed by the results from relevant VCs and feedback received from the Métis Nation of Ontario - Region 3; however, potential effects on those VCs may not 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.

Criteria used to characterize residual effects on Indigenous interests are provided in Table 28.2. 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 the Métis Nation of Ontario - Region 3.

Table 28.2 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 operation phase (41 years)</p> <p>Long-term – residual effect extends beyond the operation phase (> 41 years) and beyond the decommissioning and passive closure phase (> 46 years)</p>

¹¹ Project phases and activities are also described in Chapter 3.

Characterization	Quantitative Measure or Definition of Qualitative Categories
Frequency	Single event – effect occurs once Multiple irregular event – occurs at no set schedule Multiple regular event – occurs at regular intervals Continuous – occurs continuously
Reversibility	Reversible – the effect is likely to be reversed after activity completion and reclamation Irreversible – the effect is unlikely to be reversed

28.1.7.1 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 the Métis Nation of Ontario - Region 3 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 the Métis Nation of Ontario - Region 3.

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.

28.1.8 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 28.4. 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
- The Métis Nation of Ontario - Region 3 recommendations and identification of preferred mitigation
- Perspectives of the Métis Nation of Ontario - Region 3 on the effectiveness of the mitigation measures
- Project's benefits for the Métis Nation of Ontario - Region 3
- 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 Section 28.4 and Attachment 28.1.

28.1.9 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 28.1.4 for more detail on sources) and the understanding that Indigenous interests may be exercised or practiced on accessible lands and waters throughout the area of interest of the Métis Nation of Ontario - Region 3. 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 the Métis Nation of Ontario - Region 3, even if the Métis Nation of Ontario - Region 3 did not identify specific sites, areas, or resources in relation to the Project. 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 area of interest of the Métis Nation of Ontario - Region 3. This assessment reflects the best available information regarding Indigenous interests in relation to the Project. Canada Nickel has worked with Métis Nation of Ontario - Region 3 to review and validate the results of this assessment.¹² Feedback received has been incorporated into the assessment.

The analysis in this section incorporates the findings of the VC assessments found in the Impact Statement that are relevant to Indigenous interests; however, potential effects for supporting VCs may not fully align with effects on Indigenous interests, nor do the mitigation measures for potential effects on supporting 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 28.4).

28.1.10 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.

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 include:¹³

- 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).

¹² These efforts are also described in Chapter 7 (Description of Engagement with Indigenous Peoples).

¹³ See Chapter 8 Assessment Methodology.

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.¹⁴
- 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.

The extent of significance of adverse federal effects is characterized in Section 28.6 for those effects that remain following the implementation of avoidance, mitigation, and enhancement measures.

28.2 Existing Conditions

The Métis Nation of Ontario - Region 3 completed the following Project-specific study:

- Métis Nation of Ontario - Region 3 Impact Study: Crawford Nickel Mine Project (MNO 2024)

The results of this study are incorporated below. Canada Nickel's responses to the concerns raised and recommendations made by the Métis Nation of Ontario - Region 3 are provided in Attachment 28.1 of this chapter.

28.2.1 Rights, Governance and Legal Characteristics

The Métis Nation of Ontario was founded in 1993 to create a Métis-specific governance structure for Métis citizens in Ontario (MNO 2023a). The Métis Nation of Ontario represents Métis citizens who reside

¹⁴ 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 Métis Nation of Ontario - Region 3 regarding its preferred conditions or thresholds regarding the extent of significance of adverse federal effects.

in Ontario and are descended from mixed marriages of Indigenous women and former employees of the Hudson's Bay Company (HBC) and the North-West Company (MNO 2023a). The Métis Nation of Ontario remains the only recognized provincial registry for Métis citizens in the province (MNO 2024). Its citizenship applications are assessed by an independent Registrar who assess criteria set out in the Métis Nation of Ontario Registry Policy (MNO 2024).

Since its founding, the Métis Nation of Ontario has built a province-wide governance structure which includes (MNO 2024):

- A centralized registry of over 28,000 Métis citizens
- Approximately 30 Community Councils
- A provincial governing body that is elected by ballot box every four years
- An Annual General Assembly where regional and provincial Métis leaders report back to Métis citizens yearly between elections
- A charitable foundation, MNO Cultural Commission, which promotes and supports Métis culture and heritage
- An economic development arm, the Métis Voyageur Development Fund

The Project is located within the boundaries of the Métis Nation of Ontario - Region 3 (MNO 2023a). The Métis Nation of Ontario - Region 3 is one of nine regions established by the Métis Nation of Ontario in the province (MNO 2023a). It is in Northeastern Ontario and encompasses the Abitibi Inland Historic Métis Community's area of interest (MNO 2024).

The Métis Nation of Ontario's harvesting rights are protected under section 35 of the *Constitution Act*, 1982 and were affirmed by the findings of *R. v. Powley* in 2003 (SCC 2003). The Métis Nation of Ontario's Harvester's Certificate (the Harvesters Certificate) was first recognized by an interim agreement between the Métis Nation of Ontario and the Ontario Government in 2004 (MNO 2021, MNO 2023a; MNO 2023b). In 2018, the Métis Nation of Ontario and the Government of Ontario signed the Framework Agreement on Métis Harvesting (the Framework Agreement) which provides recognition of the Harvesting Policy along with the issue of Métis Harvesters Certificates (MNO 2023a, GovOnt and MNO 2018). While the Métis Nation of Ontario has had a Harvesting Policy in place since 1995, the most current version came into effect on August 19, 2023, superseding all previous versions of the policy (MNO 2023b).

The Métis Nation of Ontario's Harvesting Policy applies to Métis citizens who hold a valid Harvesters Certificate (MNO 2023b). Under the Métis Nation of Ontario's Harvesting Policy, Métis harvest or harvesting refers to the taking, catching, or gathering of renewable resources in Ontario including plants, fish, wildlife, and firewood taken for reasonable personal use of the Métis Nation of Ontario's citizens; it cannot be used for commercial purposes (MNO 2023b). Métis harvesting may take place throughout the year except for moose and deer hunting, which can only be harvested from September 1 to December 31 (MNO 2023b). Métis citizens who obtain a Harvesters Certificate must meet criteria consistent with *R. v. Powley* (SCC. 2003) and the Métis Nation of Ontario's Harvesting Policy (GovOnt and MNO 2018; MNO 2023b). The Harvesters Certificate is valid for five years (MNO 2023b). Through engagement with

Canada Nickel, the Métis Nation of Ontario – Region 3 expressed that any impacts to the exercise of their rights is always a top concern.

In 2015, the Métis Nation of Ontario and the Government of Canada established a Consultation Agreement that outlines what proposed actions and decisions may result in potential effects to Métis Rights (GoC n.d.). A Consultation Agreement specific to the Métis Nation of Ontario - Region 3 titled, “Métis Nation of Ontario – Consultation Protocol for the James Bay and Abitibi/Témiscamingue Métis Traditional Territories,” was also established with the purpose of protecting the rights of Métis citizens, traditional knowledge, harvesting practices and land use. It pertains to the specific relationship that rights bearing Métis citizens have to the lands in the James Bay and Abitibi Inland Historic Métis Community’s area of interest (MNO 2011).

The Métis Nation of Ontario is governed by the Provisional Council of the Métis Nation of Ontario (PCMNO), comprised of a president, chair, vice-chair, secretary treasurer, and executive senator (MNO 2023a). Province-wide elections are held every four years. There are nine regional councillors, a youth representative, post-secondary representative, and three senators (MNO 2023a). The PCMNO is required to report to its citizens at the Métis Nation of Ontario’s Annual General Assembly, held annually (MNO 2023a).

28.2.1.1 Land Management and Agreements

The PA, Indigenous Interests LSA and RSA intersects with and is located within the Métis Nation of Ontario - Region 3 and is specific to the Abitibi Inland Historic Métis Community’s area of interest (MNO 2024).

Through engagement with Canada Nickel, the Métis Nation of Ontario - Region 3 expressed that due to historic injustices created through the Canadian legal system, Métis citizens have not been afforded the same rights to lands as settlers or their First Nations counterparts, and subsequently have been required to engage in additional agreements with various levels of government to protect Métis citizens’ hunting and harvesting rights throughout the Métis Nation of Ontario’s area of interest.

As a result of an agreement in 2018 between the Métis Nation of Ontario and the Ontario Ministry of Natural Resources, Métis citizens are entitled to exercise their right to hunting and harvesting within the established boundaries of Region 3 (MNO 2023a). As established by this framework and amendments to the MNO Harvesting Policy in 2023, ‘Métis Harvest’ or ‘Métis harvesting’ is defined as “the taking, catching, gathering for reasonable personal use in Ontario of renewable resources by MNO citizens [and] includes plants, fish, wildlife and firewood, taken for heating, food, medicinal, social or ceremonial purposes and includes donations, gifts and exchange with Aboriginal persons” (MNO 2023c). The policy is “rooted in Métis law and traditions that value conservation, safety, and sustainable harvesting” (MNO 2023a).

The Métis Nation of Ontario – Region 3 expressed that its area of interest is closely linked to historic use of the waterways within the PA, Indigenous Interests LSA and RSA. This includes the North Driftwood, West Buskegau, Frederick House, Abitibi and Mattagami rivers, and the Jocko Creek watershed (MNO 2024).

The Métis Nation of Ontario - Region 3 expressed concern regarding the realignment of Highway 655, the 500kV transmission line, the rail spur, and the construction of a new 230 kV transmission line, particularly in relation to potential aquatic and terrestrial impacts on the West Buskegau River and a portion of Jocko Creek (MNO 2024). The Métis Nation of Ontario – Region 3 recognizes that as indicated in the Detailed Project Description, these activities will be “outside of the care and control of Canada Nickel” (MNO 2024).

Canada Nickel's responses and proposed mitigation measures for the concerns and recommendations made by the Métis Nation of Ontario - Region 3 are found in Attachment 28.1.

28.2.2 Population and Demographics

According to the 2021 census, 134,615 respondents identified as Métis in Ontario (Statistics Canada 2022). One fifth, approximately 36,240 respondents, identified as belonging to the Métis Nation of Ontario (Statistics Canada 2022). Of these, 32,290 live in Ontario and 3,950 live outside of Ontario (Statistics Canada 2022). Currently, the Metis Nation of Ontario has over 28,000 Métis citizens within their centralized registry (MNO 2024).

28.2.2.1 Language

According to the Métis Nation of Ontario - Region 3, Michif was once spoken across the Métis homeland, however like many other Indigenous languages the number of Michif speakers is declining (MNO 2023a). In recent years, the Métis Nation of Ontario - Region 3 has created online Michif resources for youth, new generations of speakers, and anyone wanting to learn the language (MNO 2023a). Language camps have also occurred with Métis citizens (MNO 2023a).

28.2.2.2 Education

The Métis Nation of Ontario – Region 3 initiated an Education and Training Branch in 1996 funded by the Métis Human Resources Development Agreement (MNO 2023a). It has since expanded province-wide and offers a variety of programs that serve to support the educational success of Métis citizens in Ontario (MNO 2023a).

The Métis Nation of Ontario – Region 3 offers the Education Support Advocacy program, which serves to support families, and improve the learning outcomes of youth in K-12 education. This program is for children that may be struggling with social isolation, suspensions, mental health and learning disabilities, among other issues (MNO 2023a). The Métis Nation of Ontario – Region 3 offers a Post-Secondary Education Support Program that allows citizens to apply for funding to access post-secondary education (MNO 2023a). In addition to this, the Nation offers bursaries and scholarships to help support students (MNO 2023a). The MNO Infinite Reach Student Solidarity Program strives to create a community of post-secondary students who can easily connect with each other (MNO 2023a). Through this program, the Nation creates a structured community of Métis learners and avoids the hierarchy reflected in other mentorship programs (MNO 2023a). The MNO Infinite Reach Program also serves to connect Métis students with cultural events and ease the transition of incoming students into postsecondary institutions (MNO 2023a).

28.2.3 Social Conditions and Services

The Métis Nation of Ontario signed the Canada-Métis Nation Early Learning and Child Care Accord in 2019 which was co-developed with the Government of Canada and aimed to invest funds into early learning and childcare services (MNO 2023a). The Métis Nation of Ontario's Early Learning and Child Care Program aims to improve access to culturally grounded learning opportunities for Métis communities and individuals (MNO 2023a). Additionally, the Métis Nation of Ontario offers several programs to support youth, including the Child Care Stipend Program, the Extra-Curricular Reimbursement Program, and Child Care Subsidy Program (MNO 2023a).

Within their Housing and Infrastructure Branch, the Métis Nation of Ontario offers housing services to their citizens such as the Emergency Repair Program, the Financial Literacy Program, and the Home Buyers Contribution Program (MNO 2023a). In 2019, the Métis Nation of Ontario signed the Canada-Métis Nation Homelessness Accord, which reaffirmed the support of the Government of Canada in the development of long-term homelessness solutions and an integrated support system for the Métis Nation of Ontario's citizens (MNO 2023a). As part of this, the Métis Nation of Ontario operated the Métis Housing Stabilization Program which aims to address the growing issue of homelessness and housing instability by providing housing loss prevention and housing stabilization services (MNO 2023a).

The Métis Nation of Ontario's Healing and Wellness Branch provides social programs to Métis citizens, including the Aging at Home Program, the Community Support Services Program, and the Métis Family Wellbeing Program, while the Métis Nation of Ontario's Community Wellbeing Branch provides services in their three main programs for mental wellness, community wellbeing, and advocacy (MNO 2023a).

No information for the Métis Nation of Ontario - Region 3 regarding road infrastructure and traffic safety, and railways was identified through the review of publicly available literature or through engagement with Canada Nickel.

28.2.4 Health

28.2.4.1 Conditions

The Métis Nation of Ontario - Region 3 expressed concern regarding health and well-being:

- 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 (IAAC 2023d)
- 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 (IAAC 2023d)
- 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 (IAAC 2023d)

- Increased traffic, both road and rail, may affect health and safety to citizens and affect Section 35 harvesting rights via increased noise. Additional flights at the Timmins Victor M. Power Municipal Airport may also affect noise pollution in the region (IAAC 2023d)
- The risk of chrysotile (asbestos) exposure and contamination because of the Project through airborne dust and tailings (MNO 2024)

The Métis Nation of Ontario - Region 3 also identified that increased sound from Project construction may result in increased avoidance behaviors by Métis harvesters exercising their rights in proximity to the Project (IAAC 2023d).

Canada Nickel's responses and proposed mitigation measures for the concerns and recommendations made by the Métis Nation of Ontario - Region 3 are found in Attachment 28.1.

28.2.4.2 Services

The Métis Nation of Ontario's Healing and Wellness Branch facilitates services and programs that address the holistic needs of Métis citizens in Ontario, and offers webinars on mental health, addictions, and healing (MNO 2023a). The Métis Nation of Ontario offers a 24-hour mental health and addiction crisis line to support Métis citizens. The Mental Health and Addictions Program also supports the health and wellness of the Métis Nation of Ontario and offers services such as couple counselling, addictions counselling, mental health and addictions assessments, family therapy, and many others (MNO 2023a).

Among other programs, the Ontario Ministry of Health and Long-Term Care provides annual funding to the Métis Nation of Ontario through the Aboriginal Diabetes Education Project to provide information and resources to Métis citizens (MNO 2023a). Métis citizens are at a higher risk of developing diabetes compared to the general population, which is a health concern for Métis citizens (MNO 2023a).

The Aging at Home Program, funded by the Ministry of Health and Long-Term Care offers home supports and contracted services to seniors aged 55 or older. Services include home cleaning, transportation, and landscaping (MNO 2023a).

Funded by the Province of Ontario through the Healing and Wellness Strategy, the Métis Healthy Babies Healthy Children Program assures equitable access to resources, support, and knowledge for children pre-natal to six years of age to make sure that children thrive (MNO 2023a). The program also offers preparation for parenting and pre-natal and post-natal care to assure the healthy development of children (MNO 2023a).

28.2.5 Economic Characteristics

28.2.5.1 Labour Force

The Métis Nation of Ontario offers Employment Programs including the labour market programs that deliver programs in hospitality, apprenticeships, housing, mining, tourism, and hospitality (MNO 2023a). This includes the Employability Program that serves to reduce existing barriers to employment opportunities for the Métis Nation of Ontario citizens (MNO 2023a). In addition, the Wage Subsidy

Program encourages employers to hire Métis apprentices and to help to secure long-term employment opportunities for Métis Nation of Ontario citizens (MNO 2023a).

In 2015, the Métis Nation of Ontario noted that the mining sector has provided growth opportunities for Métis citizens in Ontario (MNO 2016). In particular, the Métis Mining Strategy has provided skill development and placement opportunities in the mining sector (MNO 2016). In the 2022 to 2023 fiscal year, the Métis Nation of Ontario Employment and Training supported 1,090 clients to reach their labour market goals (MNO 2023c).

The Métis Nation of Ontario – Region 3, however, has expressed that while industrial development can positively affect the economy by creating employment opportunities and work contracts for those living in the area, as well as increased commerce in towns located near the project, Métis citizens are often more negatively impacted by industrial development due to the direct and indirect impacts to their rights and way of life (MNO 2024). The Métis Nation of Ontario – Region 3 expressed that Métis citizens tend to receive fewer benefits regarding economic impacts and that Canada Nickel should prioritize Métis citizens and Métis-owned businesses for contracts and opportunities to support the Project (MNO 2024). The Métis Nation of Ontario – Region 3 also expressed interest in participating in employment and monitoring activities (MNO 2024). However, the Métis Nation of Ontario – Region 3 further noted that economic benefits and monitoring activities, while positive, are not replacements for fulsome consultation resulting in the identification of Project impacts and direct and proportional accommodation measures to address all impacts (MNO 2024).

Canada Nickel's responses and proposed mitigation measures for the concerns and recommendations made by the Métis Nation of Ontario - Region 3 are found in Attachment 28.1.

28.2.5.2 Economic Development

In 2010, the Métis Voyageur Development Fund was created through the Métis Nation of Ontario's negotiations with the Province of Ontario as part of a Framework Agreement (MNO 2023a). This resulted in a ten year 30-million-dollar agreement with the Province of Ontario to invest and provide equity in Métis businesses supporting the resource sector (MNO 2023a).

In 2014, the Métis Nation of Ontario Prosperity and Self Sufficiency Law was passed by the Métis Nation of Ontario's Annual General Assembly, which sets a legal framework towards economic development (MNO 2023a). Later, in 2015 the Infinity Investments structures were completed, which implement the requirements of the Economic Development Law (MNO 2023a).

28.2.6 Exercised or Practiced Indigenous and Métis Rights

28.2.6.1 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). The Métis Nation of Ontario - Region 3 emphasized that Métis rights and ways of life are strongly linked to lands and resources, and the increased legal restrictions on lands created by the Project will reduce the area Métis citizens have to

express those rights. These rights extend to both hunting and harvesting rights, as well as the right to engage in cultural activities such as ceremonies, dances, camps, feasts, and rendezvous (MNO 2024).

The Métis Nation of Ontario - Region 3 expressed concerns for potential effects to customs and protocols include (MNO 2024):

- Decline in the quality and quantity of unoccupied land for the Métis Nation of Ontario – Region 3 to exercise Métis Rights or engage in social and cultural activities
- Changes in avoidance behaviours for social and cultural activities resulting from Project effects
- Citizens may be harassed or accused of trespassing in certain places where they may seek to hold a specific cultural activity due to safety concerns or where confrontation with enforcement exists

To eliminate the number of legal restrictions placed on lands that affect the ability for the Métis Nation of Ontario - Region 3 citizens to exercise Métis rights, the Métis Nation of Ontario - Region 3 recommends (MNO 2024):

- Canada Nickel situates the Project wholly on lands that are already occupied to ensure no additional legal conversion of land
- Canada Nickel provides the Métis Nation of Ontario - Region 3 citizens priority right of use on all Crown lands under disposition for the Project

Alternatively, to reduce or control the potential effect listed above, the Métis Nation of Ontario - Region 3 recommends Canada Nickel (MNO 2024):

- Reduce the amount of currently unoccupied lands requiring conversion for the Project
- Reduce the type of restriction on the Project footprint for the Métis Nation of Ontario - Region 3 citizens exercising their rights
- Offset effects by converting an equal or greater amount of currently occupied lands to unoccupied within a contextually equivalent and geographically similar area
- Compensate the Métis Nation of Ontario - Region 3 for the residual effect

The Métis Nation of Ontario - Region 3 also expressed concern for changes in avoidance behaviours resulting from Project effects (MNO 2024). As shared by the Métis Nation of Ontario – Region, avoidance behaviours extend beyond hunting and harvesting, but also include effects to customs and protocols (MNO 2024). Avoidance behaviours may result from increase or addition of conditions not preferred by Region 3 citizens while exercising their Métis Rights, or the decrease or elimination of preferred conditions by Region 3 citizens while exercising their Métis Rights (MNO 2024).

Furthermore, avoidance behaviours may be the result of real or perceived conditions or features on the land (MNO 2024). The Métis Nation of Ontario - Region 3 shared that if a Métis citizen perceives that an area is contaminated due to chemical spraying, they may avoid that area regardless of whether chemical spraying has occurred (MNO 2024). The Métis Nation of Ontario - Region 3 reported that its citizens most prefer intact forests, waterbodies and wetlands for social and ceremonial activities (MNO 2024).

Consequently, Métis citizens least prefer industrial workers, chemical spraying within one year, garbage, dust, unnatural/man-made smells and unnatural/man-made noises (MNO 2024). The areas most avoided by the Métis Nation of Ontario - Region 3 citizens include private property, mine sites, pipeline rights-of-way under construction, processing plants, and water and sewage treatment facilities (MNO 2024). The least avoided areas for cultural activities include unoccupied Crown land or inactive cut blocks (MNO 2024).

To eliminate or reduce the adverse impact from the Project on changes to the Métis Nation of Ontario - Region 3 avoidance behaviours, the Métis Nation of Ontario - Region 3 recommends (MNO 2024):

- Canada Nickel situates the Project on land that is already occupied and where no additional avoidance behaviours would occur
- Canada Nickel eliminates all activities, conditions or features that are not preferred or are avoided by Region 3 citizens while exercising their rights

Alternatively, to reduce or control the potential effect listed above, the Métis Nation of Ontario - Region 3 recommends Canada Nickel (MNO 2024):

- Reduce activities that create conditions that the Métis Nation of Ontario - Region 3 citizens avoid (e.g. increased vehicle traffic, noise, dust, odours, industrial workers, etc.)
- Compensate for remaining adverse effects

Canada Nickel's responses and proposed mitigation measures for the concerns and recommendations made by the Métis Nation of Ontario - Region 3 are found in Attachment 28.1.

28.2.6.2 Hunting, Trapping and Non-Consumptive Species

Following review of this section of the Application, the Métis Nation of Ontario - Region 3 requested that this section be updated to include a distinction between species that are hunted and trapped and those species that hold non-consumptive cultural value. The Métis Nation of Ontario – Region 3 expressed that Métis citizens view themselves as stewards of the land and seek to uphold the protection of endangered or environmentally protected animals. The Métis Nation of Ontario - Region 3 further clarified that some of the species listed below are not traditionally harvested species but are species of importance. For example, osprey and bald eagle are species of cultural importance but would not have been hunted or consumed. The heading for this section was therefore updated to include mention of non-consumptive species and the following text was revised, where applicable.

Traditional species of importance to the Métis Nation of Ontario - Region 3 that were hunted and or trapped by its citizens include marten, beaver, fisher, mink, fox, grey fox, muskrat, squirrel, otter, weasel, rabbit, wolf, coyote, lynx, wolverine, black bear, cougar, moose, boreal caribou, deer, white-tailed deer, geese, duck, grouse/partridge, and crane (IAAC 2023d).

The Métis Nation of Ontario noted that specific bird species are of critical importance to the Métis, and some examples include Canada warbler, common nighthawk, eastern whip-poor-will, olive-sided flycatcher, bobolink, barn swallow, bank swallow, evening grosbeak, rusty blackbird, yellow rail (IAAC

2023d). Other species of cultural importance include eagle and osprey, as well as snowshoe hare and little brown myotis (MNO 2024).

The Métis Nation of Ontario - Region 3 expressed concerns for potential effects to hunting and trapping, wildlife and wildlife habitat include:

- Wildlife displacement (Canada Nickel 2022)
- That noise and pollution will affect its ability to harvest (MNO 2022)
- Changes to calving areas for large game and breeding areas for reptiles, birds, and species at risk (IAAC 2023d; MNO 2022)
- Impacts to species at risks, including Blanding's turtle, salamanders, and native pollinators in the PA (MNO 2022)
- Loss of caribou and caribou habitat, specifically within the Kesagami Caribou Range that intersects the PA (IAAC 2023d; MNO 2024)
- Changes to or loss of access to the land and harvesting areas, and loss of the right to harvest (due to roads, wildfires, vegetation growth) (IAAC 2023d; MNO 2022, 2024)
- Impacts to migratory birds and their habitat from disturbance activities, such as noise and blasting, and the timing of these activities (IAAC 2023d; MNO 2022)
- Impacts from ambient lighting on migratory birds and bats (MNO 2022, 2024)
- Effects to terrestrial wildlife species from Project activities and increased hunting (IAAC 2023d)
- Effects to moose habitat, including calving sites, aquatic feeding areas, and wintering grounds (IAAC 2023d; MNO 2022)
- Effects to wildlife due to increased traffic and resulting vehicle collisions (IAAC 2023d)
- Transparent communication about potential environmental contamination resulting from Project activities (MNO 2024)
- Cumulative effects to land and resources from all industrial development due to the overlapping effects of the Project with the effects of other past, present, and potential future projects (MNO 2024)
- Effects of climate change on the environment and resources, such as game and wildlife scarcity, and harvesting seasons changing or becoming unpredictable (MNO 2024)
- Decline in the health of wild game due to pollution and contamination (MNO 2024)
- Increased traffic near harvesting areas (MNO 2024)
- Effects of alternative alignment corridor shifting project activities closer to the Mahaffey Township Ground Moraine Conservation Reserve, located 2.5 km west of the PA

Through early engagement with Canada Nickel, the Métis Nation of Ontario - Region 3 reported the historical observation of the Blanding's turtle near the PA and that it should be accounted for in baseline studies (Canada Nickel 2022).

Canada Nickel's responses and proposed mitigation measures for the concerns and recommendations made by the Métis Nation of Ontario - Region 3 are found in Attachment 28.1.

28.2.6.3 Fishing and Water

Traditional species of importance to the Métis Nation of Ontario - Region 3 include bait fish, dace, shiners, minnows, 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, and lake whitefish (Canada Nickel 2022; IAAC 2023d; MNO 2024). West Buskegau River and North Driftwood River were identified as fish habitat and as potential spawning grounds (Canada Nickel 2022; IAAC 2023d). Yellow Falls was identified as a sturgeon spawning habitat (Canada Nickel 2022). West Buskegau River and the North Driftwood River intersect the PA. West Buskegau River is located within the Indigenous Interests LSA and is located 3.6 km east of the PA, and North Driftwood River is within the Indigenous Interests LSA and RSA and intersects the PA. Yellow Falls is located within the Indigenous Interests RSA, 26.1 km northwest of the Project.

The Métis Nation of Ontario - Region 3 expressed concern for potential effects to water, fishing, fish and fish habitat including:

- Impacts on lakes near the PA (Canada Nickel 2022)
- Habitat loss and overprinting of tributaries of the North Driftwood and West Buskegau Rivers (IAAC 2023d)
- 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 (IAAC 2023d)
- Effects to water quantity and associated risks of mercury mobilization (IAAC 2023d).
- Loss of natural waterbodies (IAAC 2023d)
- Changes to groundwater-surface water interactions (IAAC 2023d)
- Effects related to blasting in or near fish and fish habitat and spawning sites and impacts related to fish relocation (IAAC 2023d)
- Impacts to human health, including actual and perceived risks at key receptors due to changes recreational and drinking water quality (IAAC 2023d)
- Effects to potable water sources and water intake at Smooth Rock Falls (IAAC 2023d)
- Changes to fish, fish habitat, and fish predators and prey may have considerable impacts to Section 35 rights, including limiting Métis way of life (IAAC 2023d; MNO 2022)
- Effects related to fish, fish habitat and predation because of Project work (MNO 2022)
- Water quality, including surface water quality, and sediment entering the channel (MNO 2022)
- Changing water levels (MNO 2022)

- Decline in water levels and/or water quality due to pollution and contamination related to Project activities (MNO 2024)
- Project development affecting spawning cycles due to pollution and contamination (MNO 2024)

The Abitibi River, Mattagami River, Frederick House River, and the Jocko Creek Watershed were reported by the Métis Nation of Ontario - Region 3 to be waterbodies/waterways that are important for cultural continuity (IAAC 2023d, MNO 2024). The PA is located within the Jocko Creek Watershed, The Mattagami River is approximately 4 km west of the PA and is located within the Indigenous Interests LSA. The Frederick House River is approximately 17 km from the PA and is located within the Indigenous Interests RSA. The Abitibi River is approximately 36 km northeast of the PA and is located within the Indigenous Interests RSA. Smooth Rock Falls, located within the Indigenous Interests RSA approximately 41 km northwest of the PA, was reported to be an important water source (IAAC 2023d).

Following review of a draft of this assessment chapter, the Métis Nation of Ontario - Region 3 expressed that their preferred mitigation and offsetting measures regarding fish and fish habitat were for Canada Nickel to restore currently disturbed lands or habitats, rather than to try to “improve” existing undisturbed habitats. Targeting undisturbed habitats for improvement or enhancement is not something the Métis Nation of Ontario - Region 3 supports as an offsetting measure, as those activities may disturb existing habitats that may be functioning already (i.e., expanding existing already functioning habitats to create new habitat). The Métis Nation of Ontario - Region 3 reported that doing so causes impacts on those already functioning habitats but also indirectly effects surrounding areas and habitats during construction (i.e., access through woodlands or wetlands to access streams). The Métis Nation of Ontario - Region 3 referenced offsetting measures from past projects that were located outside of the Métis Nation of Ontario - Region 3 area of interest, resulting in Métis citizens not being able to access the benefits. The Métis Nation of Ontario - Region 3 recommended Canada Nickel consider improving sites along the Mattagami River or other main water systems, such as the Abitibi River, which are tied to historic and current Métis use (e.g. fur trade). The Métis Nation of Ontario - Region 3 further recommended Canada Nickel look at opportunities to restore habitats at the former sawmill at Smooth Rock Falls, located upstream from the bridge on Highway 11, since the site was on the Mattagami River and was of historical importance for the Métis Nation of Ontario - Region 3.

Canada Nickel’s responses and proposed mitigation measures for the concerns and recommendations made by the Métis Nation of Ontario - Region 3 are found in Attachment 28.1.

28.2.6.4 Gathering

The Métis Nation of Ontario – Region 3 reported that the quantity and quality of harvested resources has declined, and that harvested resources are harder to find now compared to the past (MNO 2024). A citizen of the Métis Nation of Ontario – Region 3 noted that berries come out later in the season, that there are fewer berries, and that they are more bitter and smaller than they were before (MNO 2024).

The Métis Nation of Ontario - Region 3 expressed concern for potential effects to vegetation harvest identified by the Métis Nation of Ontario - Region 3 include:

- Effects of discharge locations to the harvesting of plants and mushrooms (MNO 2022)

- Effects to muskeg and unevaluated wetlands in the PA (IAAC 2023d)
- Effects to natural carbon sequestration and from forest fragmentation and contamination of vegetation from fugitive dust, metals, and nitrogen from explosives (IAAC 2023d)
- Plans for invasive plant management and revegetation methodology, and residual effects (IAAC 2023d)
- Invasive species taking over ecosystems (MNO 2024)

Traditional species of importance to the Métis Nation of Ontario - Region 3 include moss, fungi, reindeer lichen, blueberries, raspberries, gooseberries, Labrador tea, tamarack, mushrooms (IAAC 2023d).

Canada Nickel's responses and proposed mitigation measures for the concerns and recommendations made by the Métis Nation of Ontario - Region 3 are found in Attachment 28.1.

28.2.7 Cultural Heritage

For the Métis Nation of Ontario, the Métis flag and sash are important symbols for Métis citizens and their culture (MNO 2023a). The flag, which has a horizontal infinity symbol, represents the immortality of the Nation, and the blue field represents the joining of two cultures (MNO 2023a). The sash is considered an important aspect of traditional dress and symbolizes pride and identification to Métis citizens (MNO 2023a). The fiddle and jigging are also prominent in Métis culture (MNO 2023a). The fiddle is the primary instrument that accompanies the Métis jig, a dance developed by Métis citizens (MNO 2023a). Jigging combines the foot work of Native dancing with the instruments and form of European music (MNO 2023a).

The Métis Nation of Ontario - Region 3's cultural heritage in or near the PA include sacred, ceremonial, or culturally important places (e.g., waterbodies including the Mattagami River, Abitibi River, Frederick House River, West Buskegau River, North Driftwood River, and the Jocko Creek watershed), 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. The Métis Nation of Ontario - Region 3 has expressed previous concerns regarding camps in the area surrounding the Project (MNO 2022). The Métis Nation of Ontario has expressed concern that discharge areas will affect its cultural practices and result in a loss of traditional and knowledge associated with the land (MNO 2022).

The Métis Nation of Ontario - Region 3 identified the Mattagami River, Abitibi River, Frederick House River, and Jocko Creek watershed as culturally important places (IAAC 2023d, MNO 2024). The PA is located partially within the Jocko Creek watershed (MNO 2024). The Mattagami River is located approximately 4 km west of the PA, and the Frederick House River is located approximately 17 km from the PA, both of which are located within the Indigenous Interests LSA and RSA. Abitibi River is 36 km west of the PA and is within the Indigenous Interests LSA and RSA.

During the early engagement phase, the Métis Nation of Ontario - Region 3 expressed concern regarding potential effects to cultural continuity, including (IAAC 2023d): 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.

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 B10 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; Figure 28.3). 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 28.3 (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 28.3 (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). 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

28.3 Project Interactions

Table 28.3 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 28.4, in the context of effects pathways, standard and Project-specific mitigation/enhancement, and residual effects.

Table 28.3 Project Interactions with Indigenous Interests – The Métis Nation of Ontario - Region 3

Project Activities and Physical Works	Potential Project Effects		
	Change to the Métis Nation of Ontario - Region 3 Indigenous Rights	Change in the Métis Nation of Ontario-Region 3 Physical and Cultural Heritage	Change to Governance, Health, Social and Economic Conditions of the Métis Nation of Ontario - Region 3
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 the 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 the Métis Nation of Ontario - Region 3 Indigenous Rights	Change in the Métis Nation of Ontario-Region 3 Physical and Cultural Heritage	Change to Governance, Health, Social and Economic Conditions of the Métis Nation of Ontario - Region 3
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 the Métis Nation of Ontario - Region 3 Indigenous Rights	Change in the Métis Nation of Ontario-Region 3 Physical and Cultural Heritage	Change to Governance, Health, Social and Economic Conditions of the Métis Nation of Ontario - Region 3
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			
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.	–	–	✓
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.			

28.4 Assessment of Residual Effects

The assessment of residual effects is described for each of the identified Indigenous interests in Section 28.1.5. This evaluation focuses on the effect pathways listed in Section 28.1.5 and characterizes adverse residual effects according to the approach described in Section 28.1.7. A summary of the assessment of the residual effects of the Project is provided in Section 28.4.4.

Residual effects on aspects of the Métis Nation of Ontario - Region 3'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 28.4 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 the Métis Nation of Ontario - Region 3.

28.4.1 Change to the Métis Nation of Ontario - Region 3's Indigenous Rights Project Pathways

This section provides the assessment of potential Project effects on the Métis Nation of Ontario - Region 3's Indigenous Rights.

28.4.1.1 Project Pathways

All phases of the Project (construction, operation, decommissioning and closure) have the potential to affect the Métis Nation of Ontario - Region 3's Indigenous Rights. Changes to the Métis Nation of Ontario - Region 3's Indigenous Rights could result through the pathways identified in Table 28.1 in Section 28.1.5.

The conclusions in this section are informed by the results of engagement with the Métis Nation of Ontario - Region 3's, the literature review, and related biophysical and socio-economic VC assessments presented in the Impact Statement.

28.4.1.2 Mitigation and Enhancement Measures

Mitigation measures were selected based on the considerations described in Section 28.1.8 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 the Métis Nation of Ontario - Region 3's Indigenous Rights. Attachment 28.1 provides Canada Nickel's responses and proposed mitigation measures for the concerns and recommendations made by the Métis Nation of Ontario - Region 3.¹⁵

¹⁵ A complete listing of measures can be found in Appendix E (Summary of Project Commitments) of the Impact Statement.

Canada Nickel will develop and implement a Project-specific Construction Environmental Protection Plan that describes the mitigation and enhancement measures tied to Project-related activities and physical works associated with construction. The Construction Environmental Protection Plan 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 28.4.1.3, where applicable.¹⁶

Canada Nickel will continue to engage the Métis Nation of Ontario - Region 3 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., Construction Environmental Protection Plan, 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 the Métis Nation of Ontario - Region 3 throughout the life of the Project.

28.4.1.3 Project Residual Effect

The analysis in this section incorporates the findings of the VC assessments found in the Impact Statement that are relevant to the Métis Nation of Ontario - Region 3's Indigenous Rights.¹⁷

The Métis Nation of Ontario - Region 3 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 28.2.6).

A summary of Project activities during the Construction, Operation, Decommissioning, and Closure Phases is provided in Section 28.1.6.2.¹⁸ 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.¹⁹ As described in Section 28.1.6, Canada Nickel will also establish a 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

¹⁶ See Table 34.2 Chapter 34 Follow-up Programs and Adaptive Management.

¹⁷ 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.

¹⁸ Project phases and activities are also described in Chapter 3.

¹⁹ 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 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.

18,436 ha is patented (private) land, and 876 ha is assumed to be Crown land. Combined, the total area of the PA and MMB equal 31,097 ha with 1,326 ha of provincial Crown lands. 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. The Métis Nation of Ontario - Region 3'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, Canada Nickel will engage with the Métis Nation of Ontario - Region 3 to establish the conditions for access of select areas within the PA and MMB for the exercise of Indigenous 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 citizens of the Métis Nation of Ontario - Region 3 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 the Métis Nation of Ontario - Region 3 exercise of Indigenous Rights. However, the new ROW corridor may also be viewed as a hinderance by creating undesired access to harvesting areas by non-Métis citizens.

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 the Métis Nation of Ontario - Region 3. 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 the Métis Nation of Ontario - Region 3'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 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, the Project is not expected to create a change or disruption that widely reduces or restricts the Métis Nation of Ontario - Region 3's current use of lands and resources for traditional purposes, including the Métis Nation of Ontario - Region 3'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).²⁰ 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.

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 citizens of the Métis Nation of Ontario - Region 3). 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).

²⁰ See Appendix C.7 Human Health and Ecological Risk Assessment.

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 the Métis Nation of Ontario - Region 3's Indigenous 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 and decommissioning and closure activities may influence the quality of experience or required conditions that are connected to the exercise of the Métis Nation of Ontario - Region 3's Indigenous 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.²¹

²¹ See Appendix C.6 Greenhouse Gases Following the Strategic Assessment of Climate Change.

Alteration of habitats and the current and future quality, quantity, or distribution of country foods and other resources harvested by the Métis Nation of Ontario - Region 3 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, and the broader Region 3 land base. It is expected that the Métis Nation of Ontario - Region 3 will be able to continue its harvesting, hunting, trapping, and fishing activities on accessible Crown lands and other areas where its citizens currently exercise their Indigenous 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 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 the Métis Nation of Ontario - Region 3 are present in the Vegetation, Riparian, and Wetland Environments LSA (e.g., blueberries, Labrador tea, tamarack) and are likely to be present in the PA (Section 28.2.6.4). 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 the Métis Nation of Ontario - Region 3 are present in the Fish and Fish Habitat LSA (e.g., northern pike, yellow perch, burbot, walleye) (Section 28.2.6.3). 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 the Métis Nation of Ontario - Region 3 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 28.4.1.2, 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 the Métis Nation of Ontario - Region 3 are present in the Bird and Bird Habitat LSA (e.g., bald eagle, geese, ducks) (Section 28.2.6.2;). 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 the Métis Nation of Ontario - Region 3 are present in the Wildlife and Wildlife Habitat LSA (e.g., moose, beaver, marten, Canada Lynx, Northern gray wolf) (Section 28.2.6.2). 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 28.4.1.2, Canada Nickel will engage 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 28.1.8, Attachment 28.1 and Appendix E (Summary of Project Commitments) of the Impact Statement, residual effects on the Métis Nation of Ontario - Region 3's Indigenous 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, and the seasonal 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 (i.e., 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.

28.4.2 Change in the Métis Nation of Ontario - Region 3's Physical and Cultural Heritage

This section provides the assessment of potential Project effects on the Métis Nation of Ontario - Region 3's Physical and Cultural Heritage.

28.4.2.1 Project Pathways

All phases of the Project (construction, operation, decommissioning and closure) have the potential to affect the Métis Nation of Ontario - Region 3's Physical and Cultural Heritage. Changes to the Métis Nation of Ontario - Region 3's Physical and Cultural Heritage could result through the pathways identified in Table 28.1 in Section 28.1.5.

The conclusions in this section are informed by the results of engagement with the Métis Nation of Ontario - Region 3, 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.11 Stage 1 AA) conducted for the baseline investigations undertaken for the Impact Statement.

28.4.2.2 Mitigation and Enhancement Measures

Mitigation measures were selected based on the considerations described in Section 28.1.8 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 the Métis Nation of Ontario - Region 3, Physical and Cultural Heritage. Attachment 28.1 provides Canada Nickel's responses and proposed mitigation measures for the concerns and recommendations made by the Métis Nation of Ontario - Region 3.²²

²² A complete listing of measures can be found in Appendix E (Summary of Project Commitments).

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.10 Stage 1 AA; Figure 28.3)
- 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 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).

Canada Nickel will have a Heritage Chance Find Protocol agreed upon between the Nations and Canada Nickel. If an archaeological resource is discovered during the construction phase, 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.

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.

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 the Métis Nation of Ontario - Region 3 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 the Métis Nation of Ontario - Region 3 throughout the life of the Project.

28.4.2.3 Project Residual Effect

The analysis in this section incorporates the findings of the VC assessments found in the Impact Statement that are relevant to the Métis Nation of Ontario - Region 3's Physical and Cultural Heritage.²³

The Métis Nation of Ontario - Region 3 identified cultural heritage in or near the PA, including sacred, ceremonial, or culturally important places (e.g., waterbodies including the Mattagami River, Abitibi River, Frederick House River, West Buskegau River, North Driftwood River, and the Jocko Creek watershed).

Changes in air quality and noise (real or perceived) described in Section 28.4.1.3 may alter the quality of experience or necessary conditions at the Métis Nation of Ontario - Region 3's physical and cultural heritage sites within the Indigenous Interests LSA during all Project phases. If the Métis Nation of Ontario - Region 3 experience changes in necessary conditions at its 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.

As described in Section 28.4.1.3, 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 the Métis Nation of Ontario - Region 3's ability to access its physical and cultural heritage sites within the Indigenous Interest LSA and its broader area of interest to the extent that the Nation cannot continue at current activity levels, and Canada Nickel will establish the conditions for Indigenous Nations to access select areas of the PA and MMB for the exercise of Indigenous rights, when and where feasible.

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 the Métis Nation of Ontario - Region 3'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.

²³ These include Chapter 10 Geology and Geologic Hazards, Chapter 11 Soil, Chapter 12 Atmospheric Environment, Chapter 13 Acoustic Environment, and Chapter 20 Health.

With the implementation of mitigation measures outlined in Section 28.4.2.2 and, Attachment 28.1 and Appendix E (Summary of Project Commitments) of the Impact Statement, residual effects on the Métis Nation of Ontario - Region 3'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.

28.4.3 Change to Governance, Health, Social and Economic Conditions of the Métis Nation of Ontario - Region 3

This section provides the assessment of potential Project effects on the Governance, Health, Social and Economic Conditions of the Métis Nation of Ontario - Region 3.

28.4.3.1 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 the Métis Nation of Ontario - Region 3. Changes to the Métis Nation of Ontario - Region 3's Governance, Health, Social and Economic Conditions could result through the pathways identified in Table 28.1 in Section 28.1.5.

The conclusions in this section are informed by the results of engagement with the Métis Nation of Ontario - Region 3, the literature review, and related biophysical and socio-economic VC assessments presented in the Impact Statement.

The conclusions in this section are informed by the results of engagement with the Métis Nation of Ontario - Region 3, the literature review, and related biophysical and socio-economic VC assessments presented in the Impact Statement.

28.4.3.2 Mitigation and Enhancement Measures

Mitigation measures were selected based on the considerations described in Section 28.1.8 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 the Métis Nation of Ontario - Region 3's Governance, Health, Social and Economic Conditions. Attachment 28.1 provides Canada Nickel's responses and proposed mitigation measures for the concerns and recommendations made by the Métis Nation of Ontario - Region 3.²⁴

²⁴ A complete listing of measures can be found in Appendix E (Summary of Project Commitments).

Canada Nickel will continue to engage with the Métis Nation of Ontario - Region 3 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., Construction Environmental Protection Plan, Traffic Management Plan; Health and Medical Services Plan). Through this ongoing collaboration, Canada Nickel aims to foster a positive long-term relationship with the Métis Nation of Ontario - Region 3 throughout the life of the Project.

28.4.3.3 Project Residual Effect

The analysis in this section incorporates the findings of the VC assessments found in the Impact Statement that are relevant to the Métis Nation of Ontario - Region 3's Governance, Health, Social and Economic Conditions.²⁵

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 Métis citizens 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 28.4.4.3).

Residual effects are anticipated on the Métis Nation of Ontario - Region 3's Indigenous 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 the Métis Nation of Ontario - Region 3's Governance, Health, Social and Economic Conditions within the PA, MMB and Indigenous Interests LSA (Section 28.4.1.3 and Section 28.4.2.3). These residual effects are linked to the Métis Nation of Ontario - Region 3's Indigenous determinants of health, through 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 citizens 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 the Métis Nation of Ontario - Region 3 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 the Métis Nation of Ontario - Region 3 is provided in Section 28.2.3.

As described in Section 28.4.1.3, 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

²⁵ 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.

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 the Métis Nation of Ontario - Region 3 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 citizens of the Métis Nation of Ontario - Region 3 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.

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 and Inuit peoples living off-reserve and also for Métis citizens 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 the Métis Nation of Ontario - Region 3 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 (e.g., Métis citizens), 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 28.2.5, the Métis Nation of Ontario - Region 3 emphasized the importance of maintaining or improving the ability of citizens to earn a living and to increase economic benefits, investment and inclusion for its citizens and local Indigenous businesses related to development (MNO 2024). 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 28.4.1.2, Section 28.4.2.2, Attachment 28.1 and Appendix E (Summary of Project Commitments) of the Impact Statement, residual effects on the Governance, Health, Social and Economic Conditions of the Métis Nation of Ontario - Region 3 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.

28.4.4 Summary of Project Residual Effects

Table 28.4 summarizes Project residual effects on the Métis Nation of Ontario - Region 3's rights and interests. The assessment of disproportionately distributed residual effects on the Métis Nation of Ontario - Region 3's interests is provided in Section 28.4.4.3.

Table 28.4 Project Residual Effects on the Métis Nation of Ontario - Region 3's Interests

Residual Effect	Residual Effects Characterization								
	Project Phase	Direction	Magnitude	Geographic Extent	Timing	Duration	Frequency	Reversibility	
Change to the Métis Nation of Ontario - Region 3's Indigenous Rights	C/O/D	A	M	LSA	A	ST/MT	MIR/MRE	R	
Change in the Métis Nation of Ontario - Region 3's Physical and Cultural Heritage	C/O/D	A	L	LSA	A	ST/MT	MIR/MRE	R	
Change to Governance, Health, Social and Economic Conditions of the Métis Nation of Ontario - Region 3	C/O/D	A/P	L	LSA	A	ST/MT	MIR/MRE	R	
KEY: See Table 28.2 for detailed definitions Project Phase: C: Construction O: Operations D: Decommissioning and closure Direction: P: Positive A: Adverse N: Neutral		Magnitude: N: Negligible L: Low M: Moderate H: High Geographic Extent: PA: Project Area LSA: Local Study Area MMB: Modelled Mine Boundary RSA: Regional Study Area		Timing: NA: Not Applicable A: Applicable Duration: ST: Short-term MT: Medium-term LT: Long-term		Frequency: S: Single event MIR: Multiple Irregular event MRE: Multiple Regular event C: Continuous Reversibility: R: Reversible I: Irreversible			

28.4.4.1 Summary of Adverse Residual Effects

Adverse residual effects are anticipated on the Métis Nation of Ontario - Region 3's Indigenous 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 the Métis Nation of Ontario - Region 3's exercise of Indigenous 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.

28.4.4.2 Summary of Positive Changes

Positive residual effects are anticipated on the Métis Nation of Ontario - Region 3 interests within the PA, MMB, and Indigenous Interests LSA and are described below in relation to VCs considered in the Impact Statement.

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 the Métis Nation of Ontario - Region 3 if potential demands on accommodations result in efforts to increase the stock of permanent and temporary housing in the region.²⁶ 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.

28.4.4.3 Disproportionately Distributed Residual Effects on the Métis Nation of Ontario - Region 3 Subgroups

Canada Nickel recognizes that because of the location of the PA in the Métis Nation of Ontario - Region 3's area of interest, some effects, such as alteration to the current use of lands and resources may affect the Métis Nation of Ontario - Region 3 disproportionately in comparison with the non-Indigenous population. While the Project will not affect parks and protected areas, Project effects on Crown lands are predicted.

Based on the predicted residual effects described in Section 28.4, the Project may disproportionately affect the Métis Nation of Ontario - Region 3 subgroups in the following ways:

- Reduced quality of the harvesting experience, as well as access to fishing or harvesting sites, which may disproportionately affect the Métis Nation of Ontario - Region 3 citizens who rely more heavily on these environments and their resources for food, social, and ceremonial (FSC) purposes and or to provide for Elders, 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 the Métis Nation of Ontario - Region 3 citizens 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 the Métis Nation of Ontario - Region 3 citizens 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 the Métis Nation of Ontario - Region 3 citizens 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 the Métis Nation of Ontario - Region 3 in relation to traditional land use and employment conditions. Mitigation and enhancement measures are designed to limit indirect and direct effects to physical health.

²⁶ See Chapter 22 (Social Conditions).

Canada Nickel recognizes that Elders, youth, women, low-income families and other citizens of the Métis Nation of Ontario - Region 3 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 citizens of the Métis Nation of Ontario - Region 3, 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 the Métis Nation of Ontario - Region 3.

Potential Project-related changes in the cost of living and food security are expected to have disproportionate effects on the Métis Nation of Ontario - Region 3. 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 citizens of the Métis Nation of Ontario - Region 3. 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 28.2.4.1, the Métis Nation of Ontario - Region 3 expressed concern regarding impacts to 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 Métis citizens, 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 Nations experience. 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 2SLGBTQQA+ 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 the Métis Nation of Ontario - Region 3 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 (e.g., Métis citizens), Canada Nickel aims to reduce the differential effects on the Métis Nation of Ontario - Region 3 sub-groups.

28.5 Assessment of Cumulative Effects

The assessment of cumulative effects is initiated with a determination of whether two conditions exist:²⁷

- 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 is completed. 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.

²⁷ See Section 8.8 of Chapter 8 (Assessment Methodology) and Chapter 29 (Cumulative Effects Assessments).

As described in Section 28.4, residual effects are predicted on the Métis Nation of Ontario - Region 3'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 (e.g., with consideration of the emergence of the Métis in Ontario by the 18th century during the fur trade era [MNO 2023a]). 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 the Métis Nation of Ontario - Region 3'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.

28.5.1 Residual Project Effects Likely to Interact Cumulatively

The Project residual effects identified in Section 28.4 likely to act cumulatively with physical activities found in Attachment 29-1 are listed in Table 28.5.²⁸

Table 28.5 Interactions with the Potential to Contribute to Cumulative Effects to the Métis Nation of Ontario - Region 3's Rights and Interests

Physical Activities with Potential for Cumulative Effects	The Métis Nation of Ontario - Region 3's Rights and Interests		
	Change to the Métis Nation of Ontario - Region 3's Indigenous Rights	Change in the Métis Nation of Ontario - Region 3's Physical and Cultural Heritage	Change to the Métis Nation of Ontario - Region 3's Governance, Health, Social and Economic Conditions
Past and Present Physical Activities			
Mining	✓	✓	✓
Aggregate Extraction	✓	✓	✓
Community Development	✓	✓	✓
Water Management	✓	✓	✓
Transportation	✓	✓	✓
Power	✓	✓	✓
Energy	✓	✓	✓
Forestry	✓	✓	✓
Agriculture	✓	✓	✓
Recreation	✓	✓	✓
Hunting and Fishing	✓	✓	✓
Future Physical Activities			

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).

Physical Activities with Potential for Cumulative Effects	The Métis Nation of Ontario - Region 3's Rights and Interests		
	Change to the Métis Nation of Ontario - Region 3's Indigenous Rights	Change in the Métis Nation of Ontario - Region 3's Physical and Cultural Heritage	Change to the Métis Nation of Ontario - Region 3's Governance, Health, Social and Economic Conditions
Mining			
North Timmins Gold Project – Bradshaw Mine	✓	✓	✓
Upper Beaver Gold Project	✓	✓	✓
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			
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.			

28.5.2 Change to the Métis Nation of Ontario - Region 3's Indigenous 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 the Métis Nation of Ontario - Region 3's exercise of Indigenous Rights in the Indigenous Interests RSA (MNO 2024).

The Métis Nation of Ontario - Region 3 reported that there are existing legal restrictions placed on lands that affect the ability for the Métis Nation of Ontario - Region 3 citizens to exercise their Indigenous rights (MNO 2024). The Métis Nation of Ontario - Region 3 expressed concerns regarding the cumulative effects from mining, forestry, hydro power, agriculture, and other developments in their area of interest,

and how these changes have affected Métis citizens' abilities to exercise their Indigenous rights and continue with their way of life (MNO 2024). The Métis Nation of Ontario - Region 3 also expressed concern regarding the cumulative effects of declining fish populations and water quality and quantity due to the Project (MNO 2024).

28.5.2.1 Cumulative Effect Pathways

As summarized in Table 28.5, 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 the Métis Nation of Ontario - Region 3's Indigenous 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 Métis Nation of Ontario - Region 3 Indigenous Rights.

All phases of the Project (construction, operations, decommissioning and closure) have the potential to contribute to cumulative effects on the Métis Nation of Ontario - Region 3's Indigenous Rights. Cumulative effects on the Métis Nation of Ontario - Region 3's Indigenous Rights could result through the pathways identified in Table 28.1 in Section 28.1.5.

The conclusions in this section are informed by the results of engagement with the Métis Nation of Ontario - Region 3, the literature review, and related biophysical and socio-economic VC assessments presented in the Impact Statement.

28.5.2.2 Mitigation and Enhancement for Cumulative Effects

Mitigation measures to limit residual cumulative effects to the Métis Nation of Ontario - Region 3's Indigenous Rights are described in Attachment 28.1 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 the Métis Nation of Ontario - Region 3 to explore opportunities to further mitigate adverse effects to the Métis Nation of Ontario - Region 3's interests and enhance Project benefits. This includes a commitment to working directly with the Métis Nation of Ontario - Region 3 to identify opportunities for the Métis Nation of Ontario - Region 3 to realize potential benefits from the Project that can be used to both offset potential adverse effects and create positive effects for the Nation.

28.5.2.3 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 the Métis Nation of Ontario - Region 3 Indigenous Rights.²⁹

Cumulative effects from past, present, and future physical activities in combination with the Project are predicted to adversely affect the Métis Nation of Ontario - Region 3's Indigenous Rights. As described in Section 28.5.1, the Métis Nation of Ontario - Region 3 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 area of interest.

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 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 28.5 may affect access to the resources used or required for the exercise of Indigenous rights within the Indigenous Interests 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 Interests 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 28.5.

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 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.

The contribution of the Project to residual cumulative effects on the Métis Nation of Ontario - Region 3 Indigenous 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.

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.

However, following engagement with the Métis Nation of Ontario - Region 3, 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 Métis citizens 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 the Métis Nation of Ontario - Region 3 Indigenous Rights is expected to be moderate, because the area to be disturbed 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 28.5.2.2 and 28.8.

As such, no additional mitigation measures are proposed for incremental Project contributions to the cumulative effects on the related VCs or on the Métis Nation of Ontario - Region 3's Indigenous Rights.

28.5.3 Change in the Métis Nation of Ontario - Region 3's Physical and Cultural Heritage

As described in Section 28.5.2, 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 the Métis Nation of Ontario - Region 3 Physical and Cultural Heritage (MNO 2024). The Métis Nation of Ontario - Region 3 emphasized the importance of maintaining and protecting its customs, protocols, culture, traditions, and land uses (MNO 2024; IAAC 2023d).

28.5.3.1 Cumulative Effect Pathways

As summarized in Table 28.5, 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 Métis Nation of Ontario - Region 3'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 the Métis Nation of Ontario - Region 3 Physical and Cultural Heritage.

All phases of the Project (construction, operation, decommissioning, and closure) have the potential to contribute to cumulative effects on the Métis Nation of Ontario - Region 3's Physical and Cultural Heritage. Cumulative effects on the Métis Nation of Ontario - Region 3's Physical and Cultural Heritage could result through the pathways identified in Table 28.1 in Section 28.1.5.

The conclusions in this section are informed by the results of engagement with the Métis Nation of Ontario - Region 3, the literature review, and related biophysical VC assessments presented in the Impact Statement.

28.5.3.2 Mitigation and Enhancement for Cumulative Effects

Mitigation measures to limit residual cumulative effects to the Métis Nation of Ontario - Region 3, Physical and Cultural Heritage are described in Section 28.4.2.2, Attachment 28.1 and Appendix E (Summary of Project Commitments) of the Impact Statement.

28.5.3.3 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 the Métis Nation of Ontario - Region 3's Physical and Cultural Heritage.³⁰

Cumulative effects from past, present, and future physical activities in combination with the Project are predicted to adversely affect the Métis Nation of Ontario - Region 3'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 the Métis Nation of Ontario - Region 3'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 the Métis Nation of Ontario - Region 3's 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, 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 28.5 may affect the Métis Nation of Ontario - Region 3's physical or cultural heritage. These proposed developments may result in sensory disturbances and changes in air quality within the Indigenous Interests 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 28.5.

As described in Section 28.5.2.3, 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 Interests RSA, and these changes will result in residual cumulative effects on the Métis Nation of Ontario - Region 3 Physical and Cultural Heritage. If the Métis Nation of Ontario - Region 3 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.

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.

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 the Métis Nation of Ontario - Region 3'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 the Métis Nation of Ontario - Region 3, 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 Métis citizens 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 the Métis Nation of Ontario - Region 3'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 Indigenous Nations as described in Sections 28.5.3.2 and 28.8.

As such, no additional mitigation measures are proposed for incremental Project contributions to the cumulative effects on the related VCs or on the Métis Nation of Ontario - Region 3's Physical and Cultural Heritage.

28.5.4 Change to Governance, Health, Social and Economic Conditions of the Métis Nation of Ontario - Region 3

As described in Section 28.5.2, 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 the Métis Nation of Ontario - Region 3's Governance, Health, Social and Economic Conditions (MNO 2024).

The Métis Nation of Ontario - Region 3 stated that it has used the lands within its area of interest since time immemorial and its citizens depend on a deep connection with their land to support their spiritual, cultural, and economic life. The Métis Nation of Ontario - Region 3 emphasized the importance of maintaining and protecting the wellbeing and safety of its community (MNO 2024; IAAC 2023d, 2024).

28.5.4.1 Cumulative Effect Pathways

As summarized in Table 28.5, 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 Métis Nation of Ontario - Region 3'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 the Métis Nation of Ontario - Region 3'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 the Métis Nation of Ontario - Region 3's Governance, Health, Social, and Economic Conditions. Cumulative effects on the Métis Nation of Ontario - Region 3's Governance, Health, Social, and Economic Conditions could result through the pathways identified in Table 28.1 in Section 28.1.5

The conclusions in this section are informed by the results of engagement with the Métis Nation of Ontario - Region 3, the literature review, and related biophysical and socio-economic VC assessments presented in the Impact Statement.

28.5.4.2 Mitigation and Enhancement for Cumulative Effects

Mitigation measures to limit residual cumulative effects to the Métis Nation of Ontario - Region 3 Governance, Health, Social and Economic Conditions are described in Section 28.4.3.2, Attachment 28.1 and Appendix E (Summary of Project Commitments) of the Impact Statement.

28.5.4.3 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 the Métis Nation of Ontario - Region 3'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 the Métis Nation of Ontario - Region 3's Governance, Health, Social and Economic Conditions. As described in Section 28.5.4, increased development in the Indigenous Interests RSA has altered the Métis Nation of Ontario - Region 3's connection to the land and ability for its citizens 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

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.

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 demand on infrastructure, services, accommodation, and transportation has also contributed to existing cumulative effects on the Métis Nation of Ontario - Region 3'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 the Métis Nation of Ontario - Region 3'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 Governance, Health, Social and Economic Conditions.

As described in Section 28.2.5, the Métis Nation of Ontario - Region 3 emphasized the importance of maintaining or improving the ability of its citizens 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 Peoples resulting in increased income levels and provide valuable employment experience.

The contribution of the Project to residual cumulative effects on 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 citizens through employment on the Project could be leveraged in pursuit of future employment and career opportunities in the region. However, following engagement with the Métis Nation of Ontario - Region 3, 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 Métis Nation of Ontario - Region 3's decision-making in the PA and MMB, and for Métis citizens 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 the Métis Nation of Ontario - Region 3'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 28.5.4.2 and 28.8.

As such, no additional mitigation measures are proposed for incremental Project contributions to the cumulative effects on the related VCs or on the Métis Nation of Ontario - Region 3's Governance, Health, Social, and Economic Conditions.

28.5.5 Cumulative Effects Without the Project

As described in Sections 28.5.2 to 28.5.4, 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 the Métis Nation of Ontario - Region 3's interests within the Indigenous Interests RSA (MNO 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 the Métis Nation of Ontario - Region 3'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 the Métis Nation of Ontario - Region 3, 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. 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.

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

In consideration of the history and predicted trajectory of anthropogenic disturbance and land use in the Indigenous Interests RSA, cumulative effects on the Métis Nation of Ontario - Region 3's interests described in Sections 28.5.2 to 28.5.4 are predicted to occur with or without the implementation of the Project.

28.5.6 Summary of Cumulative Effects

Table 28.6 summarizes cumulative effects on the Métis Nation of Ontario - Region 3's rights and interests. The assessment of disproportionately distributed residual cumulative effects on the Métis Nation of Ontario - Region 3's rights and interests are provided following the table.

Table 28.6 Residual Cumulative Effects

Residual Cumulative Effect	Residual Cumulative Effects Characterization						
	Direction	Magnitude	Geographic Extent	Timing	Duration	Frequency	Reversibility
Change to the Métis Nation of Ontario - Region 3 Indigenous 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 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 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 area of interest. 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 to the Métis Nation of Ontario - Region 3's Indigenous 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 and future physical activities combined with the predicted residual effects of the Project are anticipated to be irreversible for Métis citizens 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 28.5.2.2 and 28.8.						

Residual Cumulative Effect	Residual Cumulative Effects Characterization						
	Direction	Magnitude	Geographic Extent	Timing	Duration	Frequency	Reversibility
Change in the Métis Nation of Ontario - Region 3 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 the Métis Nation of Ontario - Region 3'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 Métis citizens 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 28.5.3.2 and 28.8.</p>						
Change to Governance, Health, Social and Economic Conditions of the Métis Nation of Ontario - Region 3							
With the Project	A/P	L/M	PA/RSA	A	LT	MIR/MRE	R/IR
Without the Project	A/P	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 the Métis Nation of Ontario - Region 3's Governance, Health, Social, and Economic Conditions that inform the way Indigenous rights are exercised because of reduced access and decision-making abilities, and associated effects. The contribution of the Project to residual cumulative effects on 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 Métis citizens 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 Métis Nation of Ontario - Region 3's decision-making in the PA and MMB, and for Métis citizens 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 the Métis Nation of Ontario - Region 3's Governance, Health, Social and Economic Conditions is expected to be low 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 28.5.4.2 and 28.8.</p>						

Residual Cumulative Effect	Residual Cumulative Effects Characterization						
	Direction	Magnitude	Geographic Extent	Timing	Duration	Frequency	Reversibility
<p>Key: See Table 28.2 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 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 IR: Irreversible</p>							

28.5.6.1 Disproportionately Distributed Residual Cumulative Effects on the Métis Nation of Ontario - Region 3 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 the Métis Nation of Ontario - Region 3 subgroups as those identified in Section 28.4.4.3. Disproportionately distributed cumulative effects on Indigenous subgroups extend into the Indigenous Interests RSA and may also be experienced in the vicinity of the PA and MMB.³³

28.6 Extent of Significance and Prediction Confidence

As described in Section 28.1.10, 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
- 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

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

characterization attributes most applicable to one or more adverse federal effect, the concerns raised and status of the concerns, and the perspectives of the Métis Nation of Ontario - Region 3 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 the Métis Nation of Ontario - Region 3's exercise of Indigenous 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 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 28.4 and 28.5, the Métis Nation of Ontario - Region 3 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 28.5 may result in disturbance to trails and travel ways or impediments to access through fencing or other obstacles within the Indigenous Interests RSA. Canada Nickel will engage with Indigenous Nations to establish the conditions for access of select areas within the PA and MMB to support the current use of lands and resources for traditional purposes, acknowledging that, for safety and operational reasons, it may be necessary 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 Section 28.4.1.3 and 28.5.2.3. 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 the Métis Nation of Ontario - Region 3 citizens 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 the Métis Nation of Ontario - Region 3'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, physical

and cultural heritage sites) within the Indigenous Interests LSA and RSA or within its broader area of interest.

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, low 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 Métis citizens who have already experienced alienation and dispossession from harvesting areas within the Indigenous Interests LSSA 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 the Métis Nation of Ontario - Region 3's 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.

Change in 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 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 the Métis Nation of Ontario - Region 3 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 the Métis Nation of Ontario - Region 3's decision-making in the PA and MMB, and for Métis citizens 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, and commitments to collaborate 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 the Métis Nation of Ontario - Region 3's interests is moderate and is based on available information and feedback provided by the Métis Nation of Ontario - Region 3; the suite of mitigation measures and management plans proposed in Attachment 28.1 and Appendix E (Summary of Project Commitments) of the Impact Statement; Canada Nickel's understanding that the Métis Nation of Ontario - Region 3's interests occur on lands and waters within the Project assessment areas that overlap with the Métis Nation of Ontario - Region 3's area of interest; and assumptions described in Section 28.7.

28.7 Assumptions

Canada Nickel assumes that the Métis Nation of Ontario - Region 3 holds claim to asserted or established Indigenous rights in the area of the Project. By adopting a rights recognition-based approach informed by the regulatory and policy setting described in Section 28.1.1, this assessment included consideration for all effects to interests or matters of importance identified by the Métis Nation of Ontario - Region 3.

Conservative assumptions regarding the Project were also made for VCs related to the Métis Nation of Ontario - Region 3'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.

28.8 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 the Métis Nation of Ontario - Region 3 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 28.1 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 the Métis Nation of Ontario - Region 3 to develop a shared understanding of how the Project may affect its interests
- Engaging with the Métis Nation of Ontario - Region 3 to discuss the Project and its effects, understand concerns that may arise and respond to those concerns
- Engaging with the Métis Nation of Ontario - Region 3 to seek its opinions, recommendations, and Nation-specific expertise in the development of monitoring programs relating to biodiversity
- Working directly with the Métis Nation of Ontario - Region 3 to identify opportunities for the Métis Nation of Ontario - Region 3 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 will remain available through regulatory Application review should the Métis Nation of Ontario - Region 3 bring forward additional information related to this assessment or should concerns arise or requests for alternate engagement approaches be requested by the Métis Nation of Ontario - Region 3. Through ongoing engagement (i.e., throughout the life of the Project) Canada Nickel aims to maintain a positive long-term relationship with the Métis Nation of Ontario - Region 3.

³⁴ See Chapter 33 (Sustainability) of the Impact Statement.

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

28.9 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 the Métis Nation of Ontario - Region 3.

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.

The Métis Nation of Ontario - Region 3 does not possess or administer reserve or other federal lands in the Project assessment areas that would be affected by Project-related changes to the environment.

No additional mitigation measures beyond those identified are specifically required for federal lands.

28.10 References

- Canadian Council of Ministers of the Environment (CCME). 2024. Canadian Environmental Quality Guidelines Summary Table. Available at: <https://ccme.ca/en/summary-table>. Accessed October 2024.
- Canadian Nickel Company (Canada Nickel). 2022. Detailed Project Description. December 2022. Available at: <https://iaac-aeic.gc.ca/050/documents/p83857/145854E.pdf>. Accessed March 2024.
- CDSSAB (Cochrane District Social Services Administration Board). 2021. 10-Year Housing Plan Update – 2021 Progress Report. Available at: <https://www.cdssab.on.ca/images/support/HS/cochrane-10-year-housing-plan---2021-progress-report-final.pdf>. Accessed August 2024.
- City of Timmins. 2024. Mayor's State of the City 2024. Available at: https://www.timmins.ca/our_services/city_hall/mayor_and_council/mayor_s_state_of_the_city_2024. Accessed August 2024.
- Government of Canada (GoC). n.d. Consultation Agreement between the Métis Nation of Ontario and the Government of Canada. Available at: <https://www.rcaanc-cirnac.gc.ca/eng/1638462563181/1638462589270>. Accessed October 2023.
- GoC. 2020. Backgrounder - National Inquiry into Missing and Murdered Indigenous Women and Girls. Available at: <https://www.canada.ca/en/women-gender-equality/news/2019/06/backgrounder--national-inquiry-into-missing-and-murdered-indigenous-women-and-girls.html>. Accessed August 2024. Accessed August 2024.
- GoC. 2023. Implementing the *United Nations Declaration on the Rights of Indigenous Peoples Act*. Available at: <https://www.justice.gc.ca/eng/declaration/legislation.html>. Accessed November 2023.

- GoC. 2024. Metal and Diamond Mining Effluent Regulations. Available at: <https://laws-lois.justice.gc.ca/eng/Regulations/SOR-2002-222/index.html> Accessed October 2024.
- Government of Ontario (GovOnt) and Métis Nation of Ontario (MNO). 2018. Framework Agreement on Métis Harvesting. Available at: <https://www.metisnation.org/wp-content/uploads/2015/07/metis-harvesting-framework-agreement.pdf>. Accessed April 2024.
- GovOnt. 1994. Water management: policies, guidelines, provincial water quality objectives. Available at: <https://www.ontario.ca/page/water-management-policies-guidelines-provincial-water-quality-objectives> Accessed October 2024.
- GovOnt. 2002. Ontario Drinking Water Quality Standards, Safe Drinking Water Act, S.O. 2002, c. 32. Available at: <https://www.ontario.ca/laws/regulation/030169> Accessed October 2024.
- Grech, R. 2023. City donates land for 124-unit affordable housing development. Article, September 27, 2023, The Timmins Daily Press. Available at: <https://www.timminspress.com/news/local-news/city-donates-land-for-124-unit-affordable-housing-development>. Accessed August 2024.
- Health Canada. 2022. List of contaminants and other adulterating substances in foods. Available at: <https://www.canada.ca/en/health-canada/services/food-nutrition/food-safety/chemical-contaminants/contaminants-adulterating-substances-foods.html> Accessed October 2024.
- Health Canada. 2024. Guidelines for Canadian Drinking Water Quality. October. Available at: <https://www.canada.ca/en/health-canada/services/environmental-workplace-health/reports-publications/water-quality/guidelines-canadian-drinking-water-quality-summary-table.html> Accessed October 2024.
- Heidinger, L. 2021. Intimate partner violence: Experiences of First Nations, Métis and Inuit women in Canada, 2018. Catalogue no. 85-002-X, Statistics Canada. Available at: <https://www150.statcan.gc.ca/n1/en/pub/85-002-x/2021001/article/00007-eng.pdf?st=fWsqcwgqB>. Accessed August 2024.
- Impact Assessment Agency of Canada (IAAC). 2021. Guidance: Gender-based Analysis Plus in Impact Assessment. Available at: <https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/gender-based-analysis.html>. Accessed November 2023.
- IAAC. 2022a. Assessment of Potential Impacts on the Rights of Indigenous Peoples. Available at: <https://www.canada.ca/content/dam/iaac-acei/documents/policy-guidance/practitioners-guide/guidance-assessment-potential-impacts-rights-indigenous-peoples.pdf>. Accessed November 2023.
- IAAC. 2022b. Indigenous Knowledge Policy Framework for Project Review and Regulatory Decisions. Available at: <https://www.canada.ca/content/dam/iaac-acei/documents/programs/ikpfmc.pdf>. Accessed November 2023.

- IAAC. 2023a. Indigenous Knowledge Under the *Impact Assessment Act*. Procedures for Working with Indigenous Communities. Available at: <https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/indigenous-knowledge-under-the-impact-assessment-act.html>. Accessed November 2023.
- IAAC. 2023b. Protecting Confidential Indigenous Knowledge under the *Impact Assessment Act*, Supplementary Guidance to Indigenous Knowledge in Impact Assessment: Procedures for Working with Indigenous Communities. Available at: <https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/protecting-confidential-indigenous-knowledge-under-the-impact-assessment-act.html>. Accessed November 2023.
- IAAC. 2023c. Guidance: Describing Effects and Characterizing Extent of Significance. Available at: <https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/guidance-describing-effects-characterizing-extent-significance.html#toc7>. Accessed January 2024.
- IAAC. 2023d. Crawford Nickel Project – Impact Assessment Agency of Canada responses to comments received during the Planning Phase (August 8, 2022, to March 08, 2023). Canadian Impact Assessment Registry (Reference #101). Available at: <https://iaac-aeic.gc.ca/050/documents/p83857/153117E.pdf>. Accessed January 2024.
- International Commission on Illumination. 2017. CIE 150:2017 Technical Report: Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations, 2nd Edition.
- Kirmayer, L.J. 1994. Suicide Among Canadian Aboriginal Peoples. *Transcultural Psychiatry*, 31: 3 - 58.
- Loppie, C., and Wien, F. 2022. Understanding Indigenous Health Inequalities through a Social Determinants Model. National Collaborating Centre for Indigenous Health. Available at: https://www.nccih.ca/495/Understanding_Indigenous_Health_Inequalities_through_a_Social_Determinants_Model.nccih?id=10373. Accessed January 2024.
- Lentz-McGrath. 2024. Cochrane developing in-depth planning process for \$10 lots. Article, Northern Ontario Business, January 2, 2024. Available at: <https://www.northernontariobusiness.com/industry-news/design-build/cochrane-developing-in-depth-planning-process-for-10-lots-8010849>. Accessed August 2024.
- Lewis, D., James, S., Thom, O., Doxtator, S., Nahmahbin-Hiltz, M., and Beacock, E. (2021). Intangible Impacts – More-than-mental health: Indigenous identity, culture, community and relationship with land are integral to Indigenous wellbeing (training manual). Western University.
- Ontario Ministry of the Environmental, Conservation and Parks (MECP). 2021a. Fish consumption advisory. Bigwater Lake. Available at: <https://www.ontario.ca/page/fish-consumption-report?id=48378118> Accessed October 2024.

MECP. 2021b. Fish consumption advisory. Mattagami River downstream of Sturgeon Falls. Available at: <https://www.ontario.ca/page/fish-consumption-report?id=48498129> Accessed October 2024.

Métis Nation of Ontario (MNO). 2011. MNO Consultation Protocol for Abitibi/Témiscamingue and James Bay Traditional Territory. Available at: <https://www.metisnation.org/wp-content/uploads/2010/10/mno20consultation20protocol20-20abitibi-temiscamingue20region203.pdf>. Accessed October 2023.

MNO. 2016. MNO Annual Report. 2014 - 15. Available at: https://www.metisnation.org/wp-content/uploads/2016/03/annual-report-2014-15_web_optimized1.pdf. Accessed March 2024.

MNO. 2021. AGNICO Eagle Upper Beaver Project. Upper Beaver Gold Project Initial Project Description. Impact Assessment Registry (Document Reference #3). Available at: <https://iaac-aeic.gc.ca/050/evaluations/document/141196>. Accessed October 2023.

MNO. 2022. From Métis Nation of Ontario re: Comments on the Initial Project Description. Submitted on September 7, 2022. Impact Assessment Registry (Document # 35). Available at: <https://iaac-aeic.gc.ca/050/evaluations/proj/83857/contributions/id/58779>. Accessed October 2023.

MNO. 2023a. Official Website. Available at: <https://www.metisnation.org/>.. Accessed October 2023.

MNO. 2023b. MNO Harvesting Policy 2023 AGA Amendments. Available at: <https://www.metisnation.org/wp-content/uploads/2023/09/MNO-Harvesting-Policy-2023-AGA-Amendments.pdf>. Accessed March 2024.

MNO. 2023c. MNO Annual Report. 2022/23. Available at: <https://www.metisnation.org/wp-content/uploads/2023/09/MNO-AR-2022-23-EDIT2-screen.pdf>. Accessed March 2024

MNO. 2024. Métis Nation of Ontario Region 3 Impact Study: Crawford Nickel Mine Project. Calliou Group. June 2024. Report on File.

Ministry of the Environment and Energy (MOEE). 1994. Water management: policies, guidelines, provincial water quality objectives. Appendix A: Provincial Water Quality Objectives. Available at: <https://www.ontario.ca/page/water-management-policies-guidelines-provincial-water-quality-objectives#section-7> Accessed October 2024.

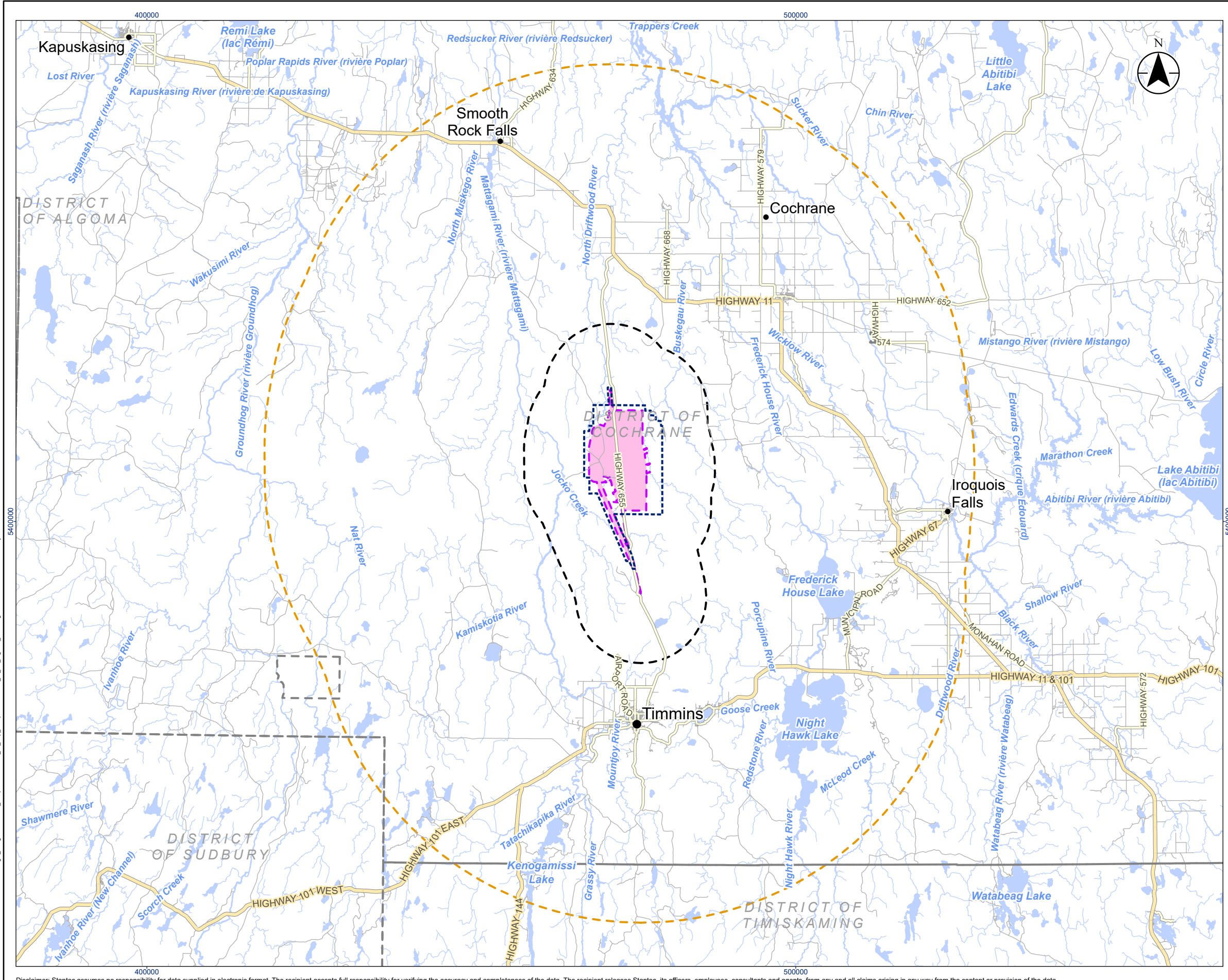
National Inquiry into Missing and Murdered Indigenous Women and Girls. 2019. Reclaiming Power and Place: The Final Report of the Nation Inquiry into Missing and Murdered Indigenous Women and Girls. Available at: https://www.mmiwg-ffada.ca/wp-content/uploads/2019/06/Final_Report_Vol_1a-1.pdf. Accessed January 2024.

Ontario Ministry of Tourism and Culture. 2011. *Standards and Guidelines for Consultant Archaeologists*. Toronto: Ministry of Citizenship and Multiculturalism

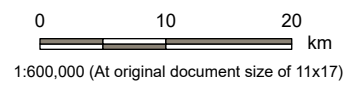
Prospectors & Developers Association of Canada (PDAC). 2022. Social Impact Report: Exploring the Social Impact of Mineral Development Projects in Indigenous Communities. Available at: <https://www.pdac.ca/indigenousaffairs/social-impact-report>. Accessed July 2024.

- Supreme Court of Canada (SCC). 1990. Judgements of the Supreme Court of Canada. R. v. Sparrow. Available at: <https://decisions.scc-csc.ca/scc-csc/scc-csc/en/item/609/index.do>. Accessed October 2024.
- SCC. 1996. Judgements of the Supreme Court of Canada. R v. Van der Peet. Available at: <https://decisions.scc-csc.ca/scc-csc/scc-csc/en/item/1407/index.do>. Accessed October 2024.
- SCC. 2003. Judgements of the Supreme Court of Canada. R. v. Powley. Available at: <https://scc-csc.lexum.com/scc-csc/scc-csc/en/item/2076/index.do>. Accessed November 2023.
- SCC. 2016. Judgements of the Supreme Court of Canada. Daniels v. Canada (Indian Affairs and Northern Development). Available at: <https://scc-csc.lexum.com/scc-csc/scc-csc/en/item/15858/index.do>. Accessed November 2023.
- Town of Smooth Rock Falls and JLR. 2022. Smooth Rock Falls Waterfront Master Plan. Available at: <https://smoothrockfalls.ca/documents/133/documents/01BFZNUC6SXF3K3NZW2JG2Y7NSAP5R5UM4/Waterfront%20Masterplan.pdf>. Accessed August 2024.
- Truth and Reconciliation Commission of Canada (TRCC). 2015a. Summary of the Final Report of the Truth and Reconciliation Commission of Canada. Available at: https://ehprnh2mwo3.exactdn.com/wp-content/uploads/2021/01/Executive_Summary_English_Web.pdf. Accessed February 2024.
- TRCC. 2015b. Calls to Action. Winnipeg, Manitoba. Available at: https://ehprnh2mwo3.exactdn.com/wp-content/uploads/2021/01/Calls_to_Action_English2.pdf. Accessed February 2024.
- UN General Assembly (United Nations General Assembly). 2008. United Nations Declaration on the Rights of Indigenous Peoples. Resolution adopted by the General Assembly on 13 September 2007. Available at: https://www.un.org/esa/socdev/unpfii/documents/DRIPS_en.pdf. Accessed November 2023.

28.11 Figures



- Legend**
- Project Area
 - Local Study Area
 - Regional Study Area
 - Modelled Mine Boundary
 - 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. Métis Nation of Ontario - Region 3 was digitized from map on <https://www.metisnation.org/about-the-mno/mno-regions/>. For cartographic purposes only. Not an official boundary.



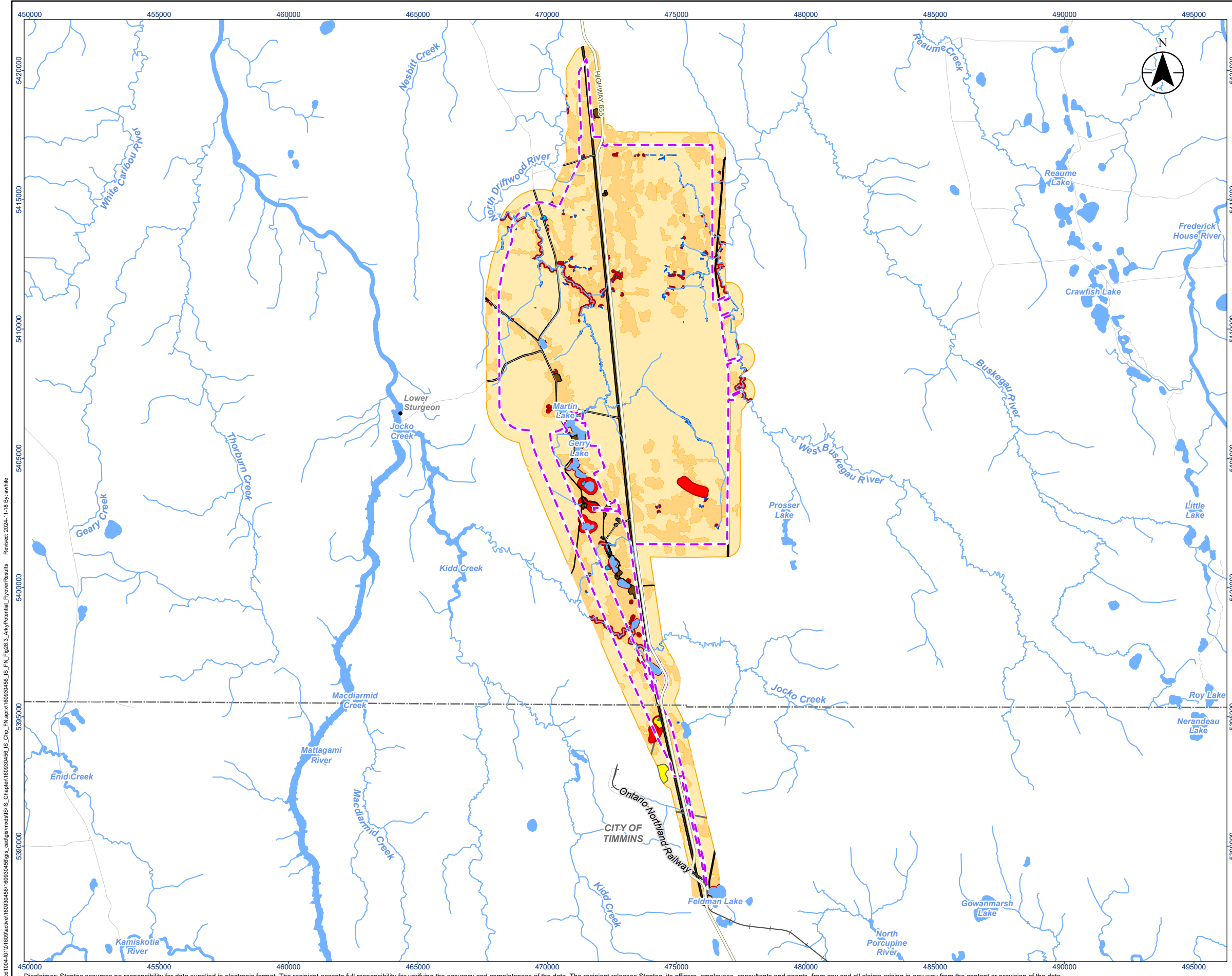
Project Location: Timmins, Ontario
 Prepared by: awhite on 2024-11-19

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

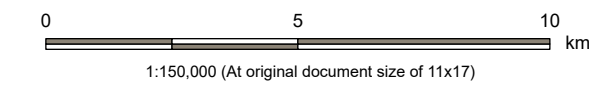
Figure No.: **28.1**

Title: **Indigenous Interests Assessment Areas - The Métis Nation of Ontario - Region 3**

\srt1004\101\009\active\160930456\gis_cad\gis_md\160930456_Chapter1\160930456_IS_Chp_FN.aprx\160930456_IS_FN_Fig28_1_MNORegion3
 Revised: 2024-11-19 By: awhite
 5400000
 5400000
 400000
 400000
 500000
 500000
 Disclaimer: Stantec assumes no responsibility for data supplied in electronic format. The recipient accepts full responsibility for verifying the accuracy and completeness of the data. The recipient releases Stantec, its officers, employees, consultants and agents, from any and all claims arising in any way from the content or provision of the data.



- 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_160930456_IS_FN_Fig25.3_Archeological_Potential_FlyoverResults
 Revised: 2024-11-18 By: awhite

Attachments

**Attachment 28.1 The Métis Nation of Ontario - Region 3
Engagement Outcomes for the Crawford Nickel
Project (the Project)**

The Métis Nation of Ontario - Region 3 Engagement Outcomes for the Crawford Nickel Project

Row No.	The Métis Nation of Ontario - Region 3 Perspectives and Concerns	Approximate Location Relative to Project	The Métis Nation of Ontario - Region 3 Recommendations	Canada Nickel Response / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
1	<p>Cultural Continuity</p> <p>The Métis Nation of Ontario - Region 3 cultural heritage in or near the Project area (PA), include 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 continuity identified by the Métis Nation of Ontario - Region 3 include 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. Through engagement with Canada Nickel, the Métis Nation of Ontario – Region 3 expressed that any impacts to the exercise of their rights is always a top concern.</p> <p>The Métis Nation of Ontario - Region 3 emphasized that Métis rights and ways of life are strongly linked to lands and resources and expressed concern that the increased legal restrictions on lands created by the Project will reduce the area that Métis citizens have to express those rights.</p> <p>Potential effects to cultural continuity, identified by the Métis Nation of Ontario – Region 3 include:</p>	<p>Project Area (PA), Local Study Area (LSA) and Regional Study Area (RSA)</p> <p>The Métis Nation of Ontario - Region 3 identified the North Driftwood River and Jocko Creek Watershed as a culturally important areas that intersects the PA.</p> <p>Additional areas identified as being culturally important include:</p> <ul style="list-style-type: none"> • 3.6 km east of the PA (West Buskegau River) • 4.1 km west of the PA (Mattagami River) • 17.4 km east of the PA (Frederick House River) • 36.4 km northeast of the PA (Abitibi River) <p>Other features and values identified by the Métis Nation of Ontario - Region 3 are provided in the following rows of this table to facilitate resource-specific responses.</p>	<p>The Métis Nation of Ontario - Region 3 recommends the following considerations for engagement and collaboration with Canada Nickel:</p> <ul style="list-style-type: none"> • Further information on decommissioning and closure plans. • Specific engagement opportunities with Canada Nickel, such as leading studies to support the development of the rights Impact Statement, including Traditional Knowledge and Land Use studies; Indigenous Knowledge and land uses, Indigenous and Treaty Rights. • 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/or 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 the Impact Statement, and during the post-approval phases of the impact assessment process. • 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. • Opportunities to verify the Agency's and Canada Nickel's records of Indigenous consultation and engagement. 	<p>Canada Nickel acknowledges that the Project is located within the Métis Nation of Ontario - Region 3 area of interest and Canada Nickel values the recommendations made by the Métis Nation of Ontario - Region 3. Responses to the Métis Nation of Ontario - Region 3 are provided below.</p> <p>Regarding the Métis Nation of Ontario - Region 3's recommendations for engagement and collaboration:</p> <ul style="list-style-type: none"> • The Métis Nation of Ontario - Region 3 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 the Métis Nation of Ontario - Region 3 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 the Métis Nation of Ontario - Region 3's participation in the assessment process, including the formation of Relationship Building Agreement (RBA) with the Nation. <p>A detailed description of Canada Nickel's engagement with the Métis Nation of Ontario - Region 3 is provided in Chapter 7. Since the submission of the Detailed Project Description (DPD), Canada Nickel has continued to engage with the Métis Nation of Ontario - Region 3 on the Project, as guided by the RBA Canada Nickel entered into with the Métis Nation of Ontario - Region 3 on September 14, 2023. Canada Nickel has continued sharing Project information with the Métis Nation of Ontario - Region 3 based on a current understanding of the Nation's area of interest and the terms of the established agreement. The data used throughout the Impact Statement has been presented according to the preference of the Métis Nation of Ontario - Region 3 through its iterative reviews, its respective policies and protocols, consent for its use and public disclosure, and views regarding the characterization of its data and Indigenous Knowledge within the assessment.</p> <p>Canada Nickel recognises 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 28). Where made available by the Métis Nation of Ontario - Region 3 through engagement, information gathering, and voluntary information sharing, Indigenous Knowledge has been reviewed and incorporated in the Impact Statement, as applicable. Through engagement activities, the Métis Nation of Ontario - Region 3 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 the Métis Nation of Ontario - Region 3'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 	<p>Chapter 28, Sections 28.1.2 and other sections.</p> <p>Chapters 7, 10, 12, 13, 22 and 29.</p>

Row No.	The Métis Nation of Ontario - Region 3 Perspectives and Concerns	Approximate Location Relative to Project	The Métis Nation of Ontario - Region 3 Recommendations	Canada Nickel Response / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
	<ul style="list-style-type: none"> Decline in the quality and quantity of unoccupied land for the Métis Nation of Ontario – Region 3 to exercise Métis Rights or engage in social and cultural activities. Changes in avoidance behaviours for social and cultural activities resulting from Project effects. Métis citizens may be harassed or accused of trespassing in certain places where they may seek to hold a specific cultural activity due to safety concerns or where confrontation with enforcement exists. Transparent communication about potential environmental contamination resulting from Project activities. Cumulative effects to land and resources from all industrial development due to the overlapping effects of the Project with the effects of other past, present and potential future projects. The relocation of Highway 655, a 500kV transmission line, a rail spur, and the construction of a new 230 kV transmission line, particularly in relation to potential aquatic and terrestrial impacts on the West Buskegau River and a portion of Jocko Creek. The Métis Nation of Ontario – Region 3 recognizes that as indicated in the Detailed Project Description (DPD), these activities will be “outside of the care and control of Canada Nickel.” However, the Métis Nation of Ontario – Region 3 notes that without fulsome information on these Project-adjacent activities, the Métis Nation of Ontario – Region 3 cannot properly assess the full scope of impacts on Métis Rights. Environmental contamination from Project development. 		<ul style="list-style-type: none"> Further information on how confidential Indigenous Knowledge and traditional land use information will be protected. Provision of sufficient capacity funding to allow for the Métis Nation of Ontario - Region 3 involvement in impact assessment, decision, and post-approval phases is required to allow for continued collaboration. Compensate the Métis Nation of Ontario - Region 3 for increased legal restrictions on lands created by the Project that prevent Métis citizens from exercising their rights. Compensate the Métis Nation of Ontario - Region 3 for effects that cannot be eliminated which cause avoidance behaviours. <p>The Métis Nation of Ontario - Region 3 recommends the following considerations regarding Project design and activities:</p> <ul style="list-style-type: none"> 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. Baseline requirements for ambient noise levels around key receptors, and potential effects of increased noise from the Project. Vibration and noise emissions mitigation and monitoring measures throughout all phases of the Project, including method to address noise complaints. 	<p>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.</p> <ul style="list-style-type: none"> 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. <p>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. The Métis Nation of Ontario - Region 3 concerns regarding ancillary components will be communicated by Canada Nickel to the third-parties responsible for their construction and/or operation.</p> <p>Regarding the Métis Nation of Ontario - Region 3's recommendation to re-use excavated waste rock, Chapter 10 includes measures that will be implemented by Canada Nickel to manage waste rock, including collection and temporary storage:</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 Industry Standard on Tailings Management or and Canadian Dam Association (CDA) guidelines for long-term care are met. <p>Regarding the Métis Nation of Ontario - Region 3's recommendation to design Project components to eliminate or reduce all activities, conditions or features that are not preferred or are avoided by the Métis Nation of Ontario - Region 3, 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. 	

Row No.	The Métis Nation of Ontario - Region 3 Perspectives and Concerns	Approximate Location Relative to Project	The Métis Nation of Ontario - Region 3 Recommendations	Canada Nickel Response / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
			<ul style="list-style-type: none"> • Consideration of Indigenous Knowledge on equitable footing with scientific or technical information to inform the impact assessment. • Key receptor locations for air quality, noise and vibration as well as key locales assessed for the visual environment must be confirmed with the Métis Nation of Ontario - Region 3 to enable consideration of points of interest or key locales for the exercise of Section 35 rights. • Redesign the PA to eliminate or reduce the amount of legal restrictions placed on lands that effect the Métis Nation of Ontario - Region 3 citizens from exercising their rights, or offset effects by converting an equal or greater amount of currently occupied lands to unoccupied within a contextually equivalent and geographically similar area. • Redesign Project components to eliminate or reduce all activities, conditions or features that are not preferred or are avoided by the Métis Nation of Ontario - Region 3 such as increased vehicle traffic, noise, dust, odours, and industrial workers. 	<ul style="list-style-type: none"> • Implement an idling policy on site for mobile equipment and vehicles. • Canada Nickel will install a trolley-assist system in the Open Pit for haul trucks to reduce diesel fuel combustion during phase 1 of operations. • Where possible maintain existing vegetation along the haul roads to act as a wind break. <p>In addition to the measures listed above to eliminate or reduce all activities, conditions or features that are not preferred or are avoided by the Métis Nation of Ontario - Region 3, Chapter 13 describes a Noise and Vibration Management Plan will be developed for the Project which will contain:</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 the Métis Nation of Ontario - Region 3's concern for potential impacts to current and future use of lands, Canada Nickel will maintain access to the lower Sturgeon Dam Road and Camp 40 Road for use by the Métis Nation of Ontario - Region 3.</p> <p>Regarding the Métis Nation of Ontario - Region 3's recommendation, additional information specific to prevent and avoid accidents is provided below in Row 3.</p> <p>Chapter 28 (Section 28.5) provides the assessment of Project-related effects and residual cumulative effects specific to and reflective of the interests of the Métis Nation of Ontario - Region 3. 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 communities in all aspects of Project activities and environmental protection. Canada Nickel is committed to continue discussions the Métis Nation of Ontario - Region 3's concern about potential environmental impacts during construction and post-construction activities, as well as the mitigation measures to reduce such impacts.</p> <p>Canada Nickel will continue to engage the Métis Nation of Ontario - Region 3 to understand and mitigate the Project's impacts on its interests, explore opportunities to enhance Project benefits included in the RBA, and consider its recommendations and input on Project decisions, including the development of management plans and offsetting (e.g. Construction Management Plan). Through this ongoing collaboration, Canada Nickel aims to foster a positive long-term relationship with the Métis Nation of Ontario - Region 3 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>	

Row No.	The Métis Nation of Ontario - Region 3 Perspectives and Concerns	Approximate Location Relative to Project	The Métis Nation of Ontario - Region 3 Recommendations	Canada Nickel Response / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
2	<p>Cultural Heritage</p> <p>The Métis Nation of Ontario - Region 3 commented on the potential presence of physical and cultural heritage resources and structures, sites, or things of historical, archaeological, paleontological or architectural significance in or near the PA, including: 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 the Métis Nation of Ontario - Region 3 include the potential presence of physical and cultural heritage resources and structures, sites, or things of historical, archaeological, paleontological or architectural significance in or near the PA.</p>	<p>PA, LSA, RSA</p> <p>The Métis Nation of Ontario - Region 3 identified the following cultural heritage areas at locations:</p> <ul style="list-style-type: none"> • 4.1 km west of the PA (Mattagami River) • 36.4 km northeast of the PA (Abitibi River) 	<p>The Métis Nation of Ontario - Region 3 recommends specific engagement opportunities with Canada Nickel, such as leading studies to support the development of the Impact Statement, including cultural and physical heritage.</p> <ul style="list-style-type: none"> • Further information on baseline conditions, including information on planned, ongoing, or completed archaeological assessments, and on whether the Project could affect underwater archaeological resources. • Further information on initial archaeological studies, including the methods in how they assessed First Nation and Métis artefacts, and the differences between the two. • Collaboration with the Métis Nation of Ontario - Region 3 to apply new archaeological methodology and research for the recovery of Métis artifacts. 	<p>Regarding Métis Nation of Ontario - Region 3 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 the first row of this table.</p> <p>Descriptions of the archaeological assessment work undertaken for the Project is provided in Chapter 28 (Section 28.2.5.5).</p> <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 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. 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 PA through the life of the Project. <p>Additional information specific to the Métis Nation of Ontario - Region 3's request for engagement opportunities specific to cultural and physical heritage is provided in Row 1 of this table.</p> <p>The complete listing of mitigation measures is provided in Appendix E (Summary of Project Commitments).</p>	<p>Chapter 28, Sections 28.2.5.5 and 28.4.2.</p>
3	<p>Health and Well-Being</p> <p>Potential effects to health and well-being values identified by the Métis Nation of Ontario - Region 3:</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 	<p>PA, LSA, RSA</p>	<p>The Métis Nation of Ontario - Region 3 recommends specific engagement opportunities with Canada Nickel, such as leading studies to support the development of the Impact Statement, including the Indigenous-led evaluation of effects on health and socio-economic conditions.</p>	<p>Canada Nickel has provided engagement opportunities for the Métis Nation of Ontario - Region 3 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 the Métis Nation of Ontario - Region 3's concern 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 28 in relation to the Métis Nation of Ontario - Region 3 interests (Sections 28.4.3 and 28.5.4).</p>	<p>Chapter 28, Sections 28.4.3, 28.4.3.3, 28.4.4.3, 28.5.4 and 28.5.6.1</p> <p>Chapters 21, 22 and 31.</p>

Row No.	The Métis Nation of Ontario - Region 3 Perspectives and Concerns	Approximate Location Relative to Project	The Métis Nation of Ontario - Region 3 Recommendations	Canada Nickel Response / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
	<p>accessibility and contamination of country foods.</p> <ul style="list-style-type: none"> • 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. • 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. • Increased traffic, both road and rail, may affect health and safety to citizens and affect Section 35 harvesting rights via increased noise. Additional flights at the Timmins Victor M. Power Municipal Airport may also affect noise pollution in the region. • Increased sound from Project construction may result in increased avoidance behaviors by Métis harvesters exercising their rights in proximity to the Project. • The risk of chrysotile (asbestos) exposure and contamination as a result of the Project through airborne dust and tailings. 			<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 results were considered in the development of mitigation and management measures, and further informed the assessment on the Métis Nation of Ontario - Region 3 interests.</p> <p>The following measures will be implemented by Canada Nickel to reduce potential adverse effects of the Project on impacts to human health and social well-being, including actual and perceived risks:</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 the Métis Nation of Ontario - Region 3’s concerns for traffic safety, Chapter 28 considers the effects on a change in demand for community services and infrastructure, including a change in demand for transportation infrastructure in relation to the Métis Nation of Ontario - Region 3 interests (Sections 28.4.3 and 28.5.4).</p> <p>Regarding the Métis Nation of Ontario - Region 3’s concern 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 28 in relation to the Métis Nation of Ontario - Region 3 interests (Sections 28.4.3 and 28.5.4).</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 	

Row No.	The Métis Nation of Ontario - Region 3 Perspectives and Concerns	Approximate Location Relative to Project	The Métis Nation of Ontario - Region 3 Recommendations	Canada Nickel Response / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
				<p>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</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 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 the Métis Nation of Ontario - Region 3's concerns for contamination of country foods and effects to human health, Chapter 31 includes an assessment of effects of potential accidents or malfunctions, including safety and mitigation measures, and a Conceptual 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 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. 	

Row No.	The Métis Nation of Ontario - Region 3 Perspectives and Concerns	Approximate Location Relative to Project	The Métis Nation of Ontario - Region 3 Recommendations	Canada Nickel Response / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
				<p>Regarding the Métis Nation of Ontario - Region 3's concern for impacts to housing availability and pricing:</p> <ul style="list-style-type: none"> • Canada Nickel conducted a housing needs assessment for the Project and it 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 the Métis Nation of Ontario - Region 3 if potential demands on accommodations result in efforts to increase the stock of permanent and temporary housing in the region. <p>Regarding Métis Nation of Ontario - Region 3's concern for potential changes for safety of women and youth due to the Project, the GBA Plus analysis conducted in Chapter 28 (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 Métis Nation of Ontario - Region 3 experiences. Canada Nickel will engage with Métis Nation of Ontario - Region 3 to develop the cultural awareness training so that it includes topics of importance to the Nation (e.g., 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.</p> <p>Regarding the Métis Nation of Ontario - Region 3 concern specific to chrysotile (asbestos) exposure and contamination, it is predicted that potential inhalation of chrysotile (asbestos) 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., PM2.5), reasonable mitigations will be undertaken to minimize releases of CoPCs to the environment and as described in Row 1, the AQMP will be developed for Project construction and operations.</p> <p>Regarding the Métis Nation of Ontario - Region 3's concern for increased traffic and flights, additional information specific to noise and vibrations is provided in Row 1 of this table.</p> <p>The complete listing of mitigation measures applicable to Health and Social Conditions potentially affected by the Project is found in Chapter 21 and 22 of the Impact Statement, respectively, and in Appendix E (Summary of Project Commitments).</p>	
4	<p><u>Economic Benefits, Investment and Inclusion</u></p> <p>The Métis Nation of Ontario – Region 3 expressed that while industrial development can positively affect the economy by creating</p>	PA, LSA, RSA	The Métis Nation of Ontario - Region 3 recommends:	Canada Nickel has provided engagement opportunities for the Métis Nation of Ontario - Region 3 relative to the Project through an RBA process. Additional information is described in Row 1 of this table.	Chapter 28, Sections 28.4.3 and 28.5.4. Chapter 23.

Row No.	The Métis Nation of Ontario - Region 3 Perspectives and Concerns	Approximate Location Relative to Project	The Métis Nation of Ontario - Region 3 Recommendations	Canada Nickel Response / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
	<p>employment opportunities and work contracts for those living in the area, as well as increased commerce in towns located near the project, Métis people are often more negatively impacted by industrial development due to the direct and indirect impacts to their rights and way of life. The Métis Nation of Ontario – Region 3 expressed that Métis people also tend to receive fewer benefits regarding economic impacts.</p> <p>The Métis Nation of Ontario – Region 3 expressed that economic benefits and monitoring activities, while positive, are not replacements for fulsome consultation resulting in the identification of Project impacts and direct and proportional accommodation measures to address all impacts.</p>		<ul style="list-style-type: none"> • Prioritize Métis people and Métis-owned businesses for contracts and opportunities to support the Project. • Involvement of the Métis Nation of Ontario – Region 3 in monitoring activities. • More engagement opportunities on industrial development activities that extend beyond the construction phase of the Project. 	<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 the Métis Nation of Ontario - Region 3, including engaging contractors to uphold commitments to encourage participation of local Indigenous services on the Project, where possible.</p> <p>Engagement with the Métis Nation of Ontario - Region 3 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 the Métis Nation of Ontario - Region 3 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>Regarding the Métis Nation of Ontario – Region 3's recommendation to prioritize the involvement of Métis people and Métis-owned businesses for contracts and opportunities to support the Project, the following measures will be implemented by Canada Nickel to reduce potential adverse effects of the Project on economic conditions:</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 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 	

Row No.	The Métis Nation of Ontario - Region 3 Perspectives and Concerns	Approximate Location Relative to Project	The Métis Nation of Ontario - Region 3 Recommendations	Canada Nickel Response / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
				<p>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.</p> <ul style="list-style-type: none"> • 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, 2SLGBTQIA+-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. Canada Nickel will provide information about contracting and employment opportunities with the Métis Nation of Ontario - Region 3, as well as obtain information regarding employment interests and the capacity and the capabilities of the Métis Nation of Ontario - Region 3 related to Project needs. Canada Nickel is committed to discussing potential economic participation in the Project to help build reciprocal business relationships with the Métis Nation of Ontario - Region 3, including engaging contractors to uphold commitments to encourage participation of local Indigenous services on the Project, where possible. <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 the Métis Nation of Ontario - Region 3 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>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 and Appendix E (Summary of Project Commitments).</p>	
5	<p><u>Hunting and Trapping, Non-Consumptive Species, Wildlife and Wildlife Habitat</u></p> <p>Traditional species of importance to the Métis Nation of Ontario - Region 3 include marten, beaver, fisher, mink, fox, grey fox, muskrat, squirrel, otter, weasel, rabbit, wolf, coyote, lynx, wolverine, black bear, cougar, moose, boreal caribou, deer, white-tailed deer, geese, duck, grouse/partridge, and crane. Osprey and bald eagle are species of cultural importance but would not have been hunted or consumed.</p> <p>The Métis Nation of Ontario – Region 3 noted that specific bird species are of critical importance to the Métis, and some examples include Canada warbler, common nighthawk, eastern whip-poor-will; olive-sided flycatcher,</p>	<p>PA, LSA, RSA</p> <p>The Métis Nation of Ontario - Region 3 identified the following wildlife and wildlife habitat area that intersects the PA:</p> <ul style="list-style-type: none"> • Kesagami Caribou Range <p>In addition, one wildlife and wildlife habitat area was identified 2.5 km west of the PA (Mahaffey Township Ground Moraine Conservation Reserve).</p>	<p>The Métis Nation of Ontario - Region 3 recommends:</p> <ul style="list-style-type: none"> • Cumulative effects assessment on Indigenous Peoples and their Traditional Territories including on air quality, and wildlife, including caribou and moose. • Mitigation measures for effects to birds, migratory birds, and their habitat from accidents, ambient light, interactions with tailings, and disturbance activities. • Mitigation and monitoring measures to manage effects to wildlife and wildlife habitat from contamination, collisions, and effects on wildlife corridors and migration. 	<p>Canada Nickel has provided engagement opportunities for the Métis Nation of Ontario - Region 3 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 a RBA related to the Métis Nation of Ontario - Region 3 harvesting rights. Additional information is provided in Row 1 of this table.</p> <p>The assessment of cumulative effects on the Métis Nation of Ontario - Region 3 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 28, Section 28.5.2.</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 to 2023. This included, but was not limited to, surveys of amphibians, Blanding's turtle, bats, moose, and boreal caribou, as well as several bird species, including Species at Risk and Species of Conservation Concern.</p> <p>Regarding the Métis Nation of Ontario – Region 3's concerns for impacts to migratory birds, Chapter 18 includes an assessment of effects on birds and bird habitats, including changes to habitat,</p>	<p>Chapter 28, Section 28.5.2 and 28.4.1.</p> <p>Chapters 9, 18, 19 and 30.</p>

Row No.	The Métis Nation of Ontario - Region 3 Perspectives and Concerns	Approximate Location Relative to Project	The Métis Nation of Ontario - Region 3 Recommendations	Canada Nickel Response / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
	<p>bobolink, barn swallow, bank swallow, evening grosbeak, rusty blackbird, yellow rail.</p> <p>Other species of cultural importance include snowshoe hare and little brown myotis.</p> <p>Potential effects to hunting and trapping, wildlife and wildlife habitat identified by the Métis Nation of Ontario - Region 3 include:</p> <ul style="list-style-type: none"> • Loss of caribou and caribou habitat. • Changes to or loss of access to the land and loss of ability to exercise the right to harvest. • Impacts to migratory birds and their habitat from disturbance activities, such as noise and blasting, and the timing of these activities. • Effects to terrestrial wildlife species from Project activities and increased hunting. • Effects to moose habitat, including calving sites, aquatic feeding areas, and wintering grounds. • Changes to calving areas for large game and breeding areas for reptiles, birds, and species at risk. • Impacts to species at risk, including Blanding's turtle, salamanders and native pollinators in the PA. • Impacts from ambient lighting on migratory birds and bats. • Effects to wildlife due to increased traffic and resulting vehicle collisions. • Effects of climate change on the environment and resources, such as game and wildlife scarcity and harvesting seasons changing or becoming unpredictable. • Decline in the health of wild game due to pollution and contamination. 		<ul style="list-style-type: none"> • Additional baseline studies including the identification of potential hibernacula for bats, potential effects to bats and bat habitat, including methodologies for assessing effects, and associated mitigation measures and their effectiveness. • 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. • Survey for all species at risk including Blanding's turtle, salamanders, and native pollinator species that may be found seasonally on site. 	<p>mortality risk, health, and abundance and distribution. This assessment is summarized in Chapter 28, Section 28.4.1.</p> <p>The following measures will be implemented by Canada Nickel to reduce potential adverse effects of the Project on birds, migratory birds and their habitat:</p> <ul style="list-style-type: none"> • Canada Nickel will restrict clearing to the approved PA. • Canada Nickel will schedule vegetation clearing activities outside the migratory breeding bird period (Zone C5: April 30 to August 20) to reduce the likelihood of disturbing or harming nests of migratory birds, to the extent practical. • If small scale, localized vegetation clearing is required during the migratory bird breeding season and the area can be effectively searched for presence of nests, Canada Nickel will have an experienced biologist/scientist survey for signs of nesting before vegetation removal. • Canada Nickel will complete pre-disturbance surveys to identify any nests that are protected under the <i>Fish and Wildlife Conservation Act</i> (e.g., Bald Eagle, other raptors) or nests that are protected year-round on Schedule 1 of the <i>Migratory Birds Regulations, 2022</i> (e.g., Pileated Woodpecker, Great Blue Heron). Canada Nickel will not remove these nests unless appropriate permits are in place. • Canada Nickel personnel or contractors will report the discovery of bird nests to appropriate Canada Nickel personal (e.g., the Environmental Department) who will follow appropriate action or follow-up as per the Wildlife Management Plan for the Project. • Canada Nickel will provide training for environmental personnel responsible for site monitoring during construction to recognize species at risk (SAR) and species of conservation concern (SOCC) that may be present in PA, as well as nests protected under the <i>Fish and Wildlife Conservation Act</i>, and Great Blue Heron and Pileated Woodpecker nests that are protected year-round on Schedule 1 of the <i>Migratory Birds Regulations, 2022</i>. • Consider the needs of bird species at risk (SAR), such as encouraging the development of a high, dense shrub layer to support Canada Warblers. • Canada Nickel will not disturb or destroy active nests of migratory birds, which are protected under the <i>Migratory Birds Convention Act</i>. Canada Nickel will also comply with the Migratory Bird Regulation, 2022, including the Schedule 1 species (e.g., Pileated Woodpecker and Great Blue Heron). • Canada Nickel will complete pre-disturbance surveys to locate raptor nests and nests of species protected on Schedule 1 of the <i>Migratory Bird Registry, 2022</i> (Pileated Woodpecker, Great Blue Heron). • Canada Nickel will notify the Environment and Climate Change Canada-Canadian Wildlife Service of mortality of any migratory bird species at risk (SAR) in the PA. • Canada Nickel will develop and implement a Site-Wide Water Management Plan (Appendix J of the Impact Statement) for the Project that will treat effluent prior to discharge to the environment, which will reduce the likelihood of harmful effects to migratory birds. • Canada Nickel will deploy bird deterrents (e.g., noise makers, wire barricades) as necessary to discourage birds from entering onsite ponds, including the Tailings Management Facility NE and NW Collection Ponds or other project infrastructure that could attract birds. 	

Row No.	The Métis Nation of Ontario - Region 3 Perspectives and Concerns	Approximate Location Relative to Project	The Métis Nation of Ontario - Region 3 Recommendations	Canada Nickel Response / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
				<ul style="list-style-type: none"> • Canada Nickel will maintain embankments of the Tailings Management Facility and collection ponds to be free of trees and shrubs to limit the attraction of waterfowl and/or wildlife to these ponds for foraging or breeding. <p>Regarding the Métis Nation of Ontario – Region 3’s concern for effects to wildlife, including moose, caribou and species at risk, 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 28, Section 28.4.1.</p> <p>The following measures will be implemented by Canada Nickel to reduce potential adverse effects of the Project on species of cultural importance to the Métis Nation of Ontario – Region 3 and their habitats:</p> <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 maintain vegetation cover along the boundaries of high activity areas (e.g. access roads) to reduce sensory effects such as noise and visual disturbances, 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 Management 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>	

Row No.	The Métis Nation of Ontario - Region 3 Perspectives and Concerns	Approximate Location Relative to Project	The Métis Nation of Ontario - Region 3 Recommendations	Canada Nickel Response / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
				<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). <p>Regarding the Métis Nation of Ontario – Region 3’s concern for effects of climate change on the environment, Canada Nickel assessed the existing meteorological environment and conducted a resilience assessment from the Project’s effects on the environment (Appendix J). 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).</p> <p>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 CO₂e. Overall, the Project will sequester more CO₂e than will be emitted by Project activities. 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> <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), and • 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 the Métis Nation of Ontario – Region 3’s concern for impacts from ambient lighting on migratory birds and bats, additional information specific to effects from lighting is provided in Row 1 of this table.</p> <p>Regarding the Métis Nation of Ontario – Region 3’s concern for effects to bird, migratory birds and their habitats from accidents, additional information specific to accidents and malfunctions is provided above in Row 3 of this table.</p>	

Row No.	The Métis Nation of Ontario - Region 3 Perspectives and Concerns	Approximate Location Relative to Project	The Métis Nation of Ontario - Region 3 Recommendations	Canada Nickel Response / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
				The complete listing of mitigation measures applicable to Bird and Bird Habitat and Wildlife and Wildlife Habitat potentially affected by the Project is found in Chapters 18 and 19 of the Impact Statement, and in Appendix E (Summary of Project Commitments).	
6	<p><u>Water, Fishing, Fish and Fish Habitat:</u></p> <p>Traditional species of importance to the Métis Nation of Ontario - Region 3 include bait fish, dace, shiners, minnows, 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, and lake whitefish.</p> <p>Potential effects to water, fishing, fish and fish habitat identified by the Métis Nation of Ontario - Region 3 include:</p> <ul style="list-style-type: none"> Habitat loss and overprinting of tributaries of the North Driftwood and West Buskegau Rivers. 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. 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. Changes to fish, fish habitat, and fish predators and prey may have considerable 	<p>PA, LSA, RSA</p> <p>The Métis Nation of Ontario - Region 3 identified the following water, fishing, fish and fish habitat areas that intersect with the PA:</p> <ul style="list-style-type: none"> North Driftwood River (fish habitat; spawning) West Buskegau River (fish habitat; spawning) Jocko Creek Watershed (important watershed) <p>Additional water, fishing, fish and fish habitat areas were identified at locations:</p> <ul style="list-style-type: none"> 4.1 km west of the PA (Mattagami River [important waterway]) 17.4 km east of PA (Frederick House River [important waterway]) 26.1 km northwest of the PA (Yellow Falls [sturgeon spawning]) 36.4 km northeast of the PA (Abitibi River [important waterway]) 41.3 km northwest of the PA (Smooth Rock Falls [water sources]) 	<p>The Métis Nation of Ontario - Region 3 recommends:</p> <ul style="list-style-type: none"> Cumulative effects assessment on Indigenous Peoples and their Traditional Territories including on water quantity, and water quality. Alternative means to reduce habitat loss and overprinting of tributaries of the North Driftwood and West Buskegau Rivers. Opportunity to provide input into the location of effluent discharge locations. Further information on heavy metals and potential for contamination, including the methods of water monitoring. Reporting on groundwater and surface water monitoring programs during the operations and post-closure periods is critical to adequate engagement with the Métis Nation of Ontario Region 3. Alternative means and mitigation for waste rock, effluent discharge, including site selection, tailings management, and ore processing location. Opportunities to improve sites along the Mattagami River or other main water systems, such as the Abitibi River, that are tied to historic and current Métis use. In particular, the Métis Nation of Ontario – Region 3 noted an opportunity to restore habitats at the former sawmill at Smooth Rock Falls, located upstream from the bridge on Highway 11. 	<p>Canada Nickel has provided engagement opportunities for the Métis Nation of Ontario - Region 3 relative to the Project, including the opportunity to identify fish species and habitats of cultural importance for consideration in the Impact Statement. Additional information is provided in Row 1 of this table.</p> <p>The Métis Nation of Ontario - Region 3 have and will continue to be engaged regarding water discharge plans. Baseline hydrology and aquatics studies have been conducted for comparison to future conditions of nearby water bodies, and results will be shared once available.</p> <p>Potential effects on fish species of cultural importance to the Métis Nation of Ontario - Region 3 were assessed in Chapters 17 and 21 and summarized in Chapter 28 (Sections 28.4.1 and 28.5.2).</p> <p>Potential effects on water quality and quantity relative to the Métis Nation of Ontario - Region 3 interests were assessed in Chapters 14 and 15 and summarized in Chapter 28 (Sections 28.4.1 and 28.5.2).</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>The assessment of cumulative effects on the Métis Nation of Ontario – Region 3 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 28 (Section 28.5.2). 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>Regarding the Métis Nation of Ontario – Region 3's concerns for changes to water quantity and quality, 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 increased flows and, if necessary, implement grouting or other practical measures to reduce groundwater inflow. 	<p>Chapter 28, Sections 28.4.1 and 28.5.2.</p> <p>Chapters 9, 14, 15, 17 and 21.</p>

Row No.	The Métis Nation of Ontario - Region 3 Perspectives and Concerns	Approximate Location Relative to Project	The Métis Nation of Ontario - Region 3 Recommendations	Canada Nickel Response / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
	<p>impacts to Section 35 rights, including limiting Métis way of life.</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 the Métis Nation of Ontario – Region 3’s concerns for fish and fish habitat, Chapter 9 contains an assessment of existing conditions for fish and fish habitat, which were informed from a desk-top review of existing reports, provincial and federal datasets, Indigenous Knowledge provided by Indigenous Nations, and a three-year field program conducted between 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>	

Row No.	The Métis Nation of Ontario - Region 3 Perspectives and Concerns	Approximate Location Relative to Project	The Métis Nation of Ontario - Region 3 Recommendations	Canada Nickel Response / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
				<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 related to the Métis Nation of Ontario – Region 3 interests was provided in Chapter 28 (Section 28.4.1 and 28.5.2).</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>Canada Nickel will continue to engage the Métis Nation of Ontario - Region 3 to seek its recommendations regarding sites that should be considered for reclamation efforts.</p> <p>Regarding the Métis Nation of Ontario - Region recommendation for Alternative means and mitigation for waste rock, effluent discharge, including site selection, tailings management, and ore processing location, 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>	

Row No.	The Métis Nation of Ontario - Region 3 Perspectives and Concerns	Approximate Location Relative to Project	The Métis Nation of Ontario - Region 3 Recommendations	Canada Nickel Response / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
				<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>The complete listing of mitigation measures is provided in Appendix E (Summary of Project Commitments) of the Impact Statement.</p>	
7	<p>Vegetation and Plant Gathering</p> <p>Traditional species of importance to the Métis Nation of Ontario - Region 3 include moss, fungi, reindeer lichen, blueberries, raspberries, gooseberries, Labrador tea, tamarack, mushrooms, spruce, cedar, sage, and sweetgrass</p>	PA, LSA, RSA	<p>The Métis Nation of Ontario - Region 3 recommends:</p> <ul style="list-style-type: none"> • Cumulative effects assessment on Indigenous Peoples and their Traditional Territories including the effects on plants. • Information on plant species found on site, specifically plants used as medicines or country foods. 	<p>Canada Nickel has provided engagement opportunities for the Métis Nation of Ontario - Region 3 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 the first row of this table.</p> <p>Potential effects on plant species of cultural importance to the Métis Nation of Ontario - Region 3, including those used as medicines or country foods, were assessed in Chapters 16 and 21 and summarized in Chapter 28 (Section 28.4.1).</p> <p>Regarding the Métis Nation of Ontario – Region 3’s recommendation to assess cumulative effects on Indigenous Peoples and their Traditional Territories, Chapter 29 provides the assessment of cumulative effects relative to each of the VCs considered in the Impact Statement. The results of the</p>	<p>Chapter 28, Sections 28.4.1 and 28.5.2.</p> <p>Chapters 16, 19, 21 and 29.</p>

Row No.	The Métis Nation of Ontario - Region 3 Perspectives and Concerns	Approximate Location Relative to Project	The Métis Nation of Ontario - Region 3 Recommendations	Canada Nickel Response / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
	<p>Potential effects to vegetation harvest identified by the Métis Nation of Ontario - Region 3 include:</p> <ul style="list-style-type: none"> • Effects to muskeg and unevaluated wetlands in the PA. • Effects to natural carbon sequestration, and from forest fragmentation and contamination of vegetation from fugitive dust, metals, and nitrogen from explosives. • Plans for invasive plant management and revegetation methodology, and residual effects. 		<ul style="list-style-type: none"> • Information regarding the development of a noxious/invasive weed management plan. 	<p>cumulative effects assessment completed in Chapter 19 inform the assessment of cumulative effects on Indigenous Interests conducted in Chapters 25 - 28. The assessment of cumulative effects on the Métis Nation of Ontario - Region 3 interests, including plants present in its area of interest, is provided in Chapter 28 (Section 28.5.2). The assessment of cumulative effects on Vegetation, Riparian and Wetland Environments is provided in Chapter 29.</p> <p>Regarding the Métis Nation of Ontario – Region 3’s concern for effects to muskeg, unevaluated wetlands and other plant species in the PA, 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. • 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>Regarding the Métis Nation of Ontario – Region 3’s concern for natural carbon sequestration, additional information specific to carbon sequestration and climate change is provided in Row 6 of this table.</p> <p>The complete listing of mitigation measures applicable to Vegetation and Plant Gathering potentially affected by the Project is found in Chapter 16 of the Impact Statement and in Appendix E (Summary of Project Commitments).</p>	

Row No.	The Métis Nation of Ontario - Region 3 Perspectives and Concerns	Approximate Location Relative to Project	The Métis Nation of Ontario - Region 3 Recommendations	Canada Nickel Response / Proposed Mitigation Measures ¹	Where Addressed in Impact Statement
<p>Note: ¹ The complete listing of mitigation measures is provided in Appendix E (Summary of Project Commitments).</p>					
<p>SOURCES: Feedback obtained through Canada Nickel Project-specific engagement with the Métis Nation of Ontario – Region 3. Refer to Chapter 7 of the Impact Statement for additional details. Impact Assessment Agency of Canada (IAAC 2023). Crawford Nickel Project – Impact Assessment Agency of Canada responses to comments received during the Planning Phase (August 8, 2022 to March 08, 2023). Canadian Impact Assessment Registry (Reference #101). Available at: https://iaac-aeic.gc.ca/050/evaluations/document/153115. Accessed January 2024. The Métis Nation of Ontario. 2022. Crawford - MNO Comments on the Initial Project Description for the for The Canada Nickel Company’s Crawford Project. Submitted September 7, 2022. Canadian Impact Assessment Registry (Reference #35). Available at: https://iaac-aeic.gc.ca/050/evaluations/proj/83857/contributions/id/58779. Accessed January 2024. The Métis Nation of Ontario. 2023. Review of the Draft Version Tailored Impact Statement (TIS) Guidelines for the Crawford Nickel Project dated February 6, 2023. Submitted March 8, 2023. Canadian Impact Assessment Registry (Reference #91). Available at: https://iaac-aeic.gc.ca/050/evaluations/proj/83857/contributions/id/59443. Accessed January 2024. The Métis Nation of Ontario. 2024. The Métis Nation of Ontario Region 3 Impact Study: Crawford Nickel Mine Project. Calliou Group. June 2024. Report on File.</p>					