



NESKANTAGA FIRST NATION

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Website: www.neskantaga.com

The Honourable Julie Dabrusin,
Minister of Environment and Climate Change,
House of Commons
Ottawa, ON
K1A 0A6

VIA EMAIL: ministre-minister@ec.gc.ca

Copied to IAAC via email: information@iaac-aeic.gc.ca

25 January 2026

Subject: Supplemental Information for the Designation Request for the Eagle's Nest Mining Project

Dear Minister,

We are writing to supplement our request for designation of the Eagle's Nest Mining Project dated 28 October 2025, and to provide additional information for consideration in your decision-making.

In addition to the matters raised in our earlier correspondence (attached here in Appendix 1), we wish to draw your attention to relevant findings in the Regional Assessment Interim Report for the Ring of Fire, submitted to IAAC on 20 January 2026. As per section 9(2)(c) of the Impact Assessment Act, 2019 (IAA) you may consider information pertaining to the regional assessment in your decision-making about the designation request. We further submit that the Eagle's Nest project meets the exceptional circumstances identified as justifying a request for designation.

1. Canada's Commitment to Implement UNDRIP

The Interim Report of the Regional Assessment for the Ring of Fire reaffirms IAAC's commitment to implementing the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), including the principle of free, prior, and informed consent (FPIC).¹ The report states that "these commitments also guide IAAC's conduct in the ... assessment of proposed future development(s) in the assessment area under the Impact Assessment Act".² In light of this commitment, decision-making under the Impact Assessment Act must meaningfully reflect the perspectives of Indigenous communities whose rights are directly affected, including Neskantaga First Nation.

¹ Impact Assessment Agency of Canada, Interim Report for the Regional Assessment within the Ring of Fire Area at pages 11 and 31. [*Regional Assessment Interim Report*]

² Ibid. at 12.



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The Eagle's Nest–Blackbird mining complex is located within the Ring of Fire region and poses significant and direct impacts on Neskantaga's rights and interests. Therefore, Neskantaga First Nation's perspective on projects planned within the region need to be seriously considered, and our consent sought before any mining is allowed on our traditional territories to be consistent with UNDRIP and the interim report.

Section 9(2)(c) of the IAA empowers the Minister to consider “any relevant assessment,” including a regional assessment conducted under section 92 of the Act.³ In this context, we urge the Minister to give due weight to the commitments within the interim report and to ensure that decision-making aligns with Canada's obligations under UNDRIP.

Accepting Neskantaga's request for designation of the Eagle's Nest project would create a critical opportunity for meaningful engagement with affected Indigenous communities, allow for a comprehensive assessment of the impacts of the Eagle's Nest–Blackbird complex on Neskantaga's rights, and support IAAC in fulfilling its commitments under both UNDRIP and the Regional Assessment Interim Report.

2. Eagle's Nest is in an “Environmentally Sensitive” Region

IAAC's guidance documents on designation of a project for assessment under the IAA provides discretionary power to the Minister to consider “exceptional circumstances such as where a project is proposed in an environmentally sensitive location....”⁴

Neskantaga First Nation maintains that the Eagle's Nest–Blackbird mining complex meets the thresholds set out in the Physical Activities Regulations when considered as an integrated project. However, even if the Eagle's Nest Mine were assessed in isolation from the Blackbird Mine, the project would nonetheless meet the exceptional circumstances identified in IAAC's guidance.

The Ring of Fire region has been explicitly characterized as an environmentally sensitive area by the Project Working Group established for the Regional Assessment. The Interim Report of the Regional Assessment for the Ring of Fire further describes the boreal forests and peatlands of Ontario's Far North as “environmentally sensitive”.⁵ These findings underscore the heightened ecological vulnerability of the region in which the Eagle's Nest project is proposed.

As detailed in Neskantaga's submission dated 28 October 2025, the Eagle's Nest project poses a significant risk of environmental harm to this sensitive landscape. In the context of s.9(2)(c)

³ Impact Assessment Act 2019 at s. 9(2)(c).

⁴ IAAC, Designating a Project under the Impact Assessment Act, online: <https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/designating-project-impact-assessment-act.html>

⁵ *Regional Assessment Interim Report supra*, note 1 at page 60.



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of the IAA, we urge you to consider these findings from the Interim Report in your decision-making on the project designation request.

Sincerely,

<Original signed by>

Chief Gary Quisses,

Neskantaga First Nation



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President, Impact Assessment Agency of Canada

BY EMAIL

December 15, 2025

Subject: Your letter dated November 24, 2025 to Sarah Harrison (DM MECP)

Dear Mr. Hubbard,

I am writing to express our concerns regarding the Eagle's Nest Mine as referenced in your letter to the Deputy Minister of the Ontario Ministry of the Environment, Conservation and Parks (MECP), a copy of which was provided to Neskantaga First Nation.

First, we are concerned that your letter does not mention [our community's Designation Request for the Eagle's Nest Mine](#) dated 28 October 2025. By indicating that the Eagle's Nest project will not be subject to a federal impact assessment, the letter appears to prejudge the outcome of that request, and potentially to signal an unlawful fettering of the Minister's discretion.

Second, we wish to clarify that the Eagle's Nest project may not fall below the threshold set out on the Project List, (or the [Physical Activities Regulations](#)), as your letter seems to suggest. Publicly accessible documentation from Wyloo, including materials on the company's website, states that the underground infrastructure associated with the Eagle's Nest Mining Project will be used to access the Blackbird deposit located less than one kilometer away.

The Eagle's Nest Mine has a production capacity of 11.1 million tonnes of ore, and the Blackbird deposit has nearly double that production capacity of 20.5 million tonnes of ore. It is not possible to know, based on publicly available information, whether the volume of ore processed at the "Eagle's Nest – Blackbird Complex" (a term used by Wyloo) will exceed the threshold set out in the [Physical Activities Regulations](#), and therefore whether it will automatically trigger a federal impact assessment. Further, as you know, the thresholds set out on the Project List are intended to act as proxies for the scale of a project likely to cause adverse environmental effects in areas of federal jurisdiction; in other words, the legislative objective is to identify major projects with the greatest potential for such adverse effects, and make them subject to an impact assessment process.

In these respects, we find your letter to MECP indicating that the Eagle's Nest mine will not be subject to a federal impact assessment to be at the very least incomplete, and potentially misleading to various parties, including the public. Worse, the letter appears to prejudge the outcome of our Designation Request.

As such, we ask that you issue a correction to this letter as soon as possible.

Sincerely,

<Original signed by>

Chief Chris Quisess
Neskantaga First Nation