

Federal Authority Advice Record (FAAR)**FAAR Response must be submitted by February 27, 2026**

Baptiste Nickel Project – FPX Nickel Corp. (proponent)

Registry File: 90051

Department/Agency	Indigenous Services Canada
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1. Will your department or agency exercise a **power, perform a duty or function**, or provide **financial assistance**, related to the project to enable it to be carried out in whole or in part?

Indigenous Services Canada does not plan on exercising a power or performing a duty or function relative to this project proposal.

- a) Specify the power, duty or function, or financial assistance, and the likelihood that it will be required to construct the project, based on the Initial Project Description, as either Required, Potential, Likely, Unlikely or Not Required
 - b) Describe any associated Indigenous or public consultation, including timelines
 - c) Describe any associated information requirements (e.g., alternative means assessment, habitat offsetting), and specify those that may be coordinated with the impact assessment process, if an impact assessment is required
 - d) Identify any associated project-specific guidance or issues of which the proponent should be aware, or information the proponent should provide.
 - e) Indicate whether your department or agency has identified any power that it will not be exercising or may not be able to exercise to allow the project to be carried out, in whole or in part.
2. **Using Table 1**, identify project- and context- specific **key issues**, based on the expertise within your mandate¹ and the information in your possession, including the Initial Project Description, any exchanges with the proponent or others related to the project and known means to address the effects of the project. For each key issue:
 - a) Specify the key issue (e.g., specific species and location)
 - b) Specify the project component or activity linked to the key issue
 - c) Explain why it's a key issue based on:
 - i. biophysical effect pathway(s) from the specific project component or activity
 - ii. concern unique to the project or a priority within your mandate
 - iii. the issue being material² to decision making under the *Impact Assessment Act*
 - d) Identify how the issue could be resolved, including through means other than an impact assessment
 - e) Identify additional information the proponent could provide including to give confidence on how the issue can be addressed through other means.

¹ Refer to the [Memoranda of Understanding with IAAC](#).

² An issue is material to decision making if its analysis is anticipated to affect the conclusions on (1) whether adverse effects within federal jurisdiction or direct and incidental adverse effects (collectively adverse federal effects) are likely not significant, or of low, medium or high significance; (2) appropriate mitigation measures for significant adverse federal effects; or (3) justification in the public interest

Jan Triska

Name and Title of Departmental / Agency Responder

Table 1: Key Issues to inform the impact assessment process

This table should outline key issues to inform the impact assessment process, including whether an impact assessment is required and, if so, the scope of the assessment and tailoring of the Tailored Impact Statement Guidelines/Application Information Requirements in a substituted assessment.

Key issues are the major concerns directly related to a project component or activity, the analysis of which is anticipated to be material to decision-making under the *Impact Assessment Act*.

Federal authorities' advice should be guided by the identification and resolution of key issues. If an impact assessment is required, it will be focused on key issues.

Comment ID	a) Key issue	b) Project component or activity	c)(i) Biophysical effect pathway(s)	c)(ii) Concern unique to the project or a priority within your mandate	c)(iii) Material to federal decision-making	d) Means for issue resolution	e) Additional information from the proponent
<p>Identify comments by organization and comment number.</p> <p>e.g.: IAAC-01</p>	<p>Specify the key issue (e.g., specific species and location).</p>	<p>Identify the project component or activity linked to the key issue.</p> <p>Be specific about the nature, scale, novelty and complexity or the component or activity.</p>	<p>Identify the specific biophysical effect pathway between the project component or activity and the affected environmental or human receptor (including Indigenous Peoples).</p>	<p>Describe why it's a key issue within the mandate of your department or agency, including in terms of priorities of the federal government and in terms of anticipated likelihood, severity or uncertainty of effects.</p> <p>Identify if the key issue is common for projects of this nature or in this sector, or whether it's unique to this project due to its complexity, size or novelty; a sensitive or rare receiving environment; and/or proximity of sensitive environmental or human receptors (including Indigenous Peoples).</p>	<p>Describe why the key issue is material to decision-making as either:</p> <ul style="list-style-type: none"> • an adverse effect within federal jurisdiction, or a direct or incidental adverse effect, that may be significant based on available evidence including: <ul style="list-style-type: none"> ○ federal experts' knowledge and experience with past project assessments; ○ presence of sensitive species, habitats or human receptors (including Indigenous Peoples); ○ novel or complex project activities, components or technologies; ○ high uncertainties in effects or in the effectiveness 	<p>Describe how the key issue could be resolved or addressed by:</p> <ul style="list-style-type: none"> • Any means, including powers, duties, functions, frameworks, policies or guidance that your department or agency has; • Any means, including powers, duties, functions, frameworks, policies or guidance from another jurisdiction, including the province; • Common, proven, well-understood or standard mitigation measures to mitigate the effect or effect pathway(s); or • Commitments made by the proponent (e.g., in the Initial Project Description). 	<p>Describe information the proponent can provide, or commitments the proponent can make, in their Response to the Summary of Issues that would provide confidence that the issue can be resolved by existing means.</p> <p>Consider whether information, studies, analyses or collaborative work with other authorities would be required to address the issue beyond existing means.</p>

					<ul style="list-style-type: none"> ○ <i>of mitigation measures;</i> ○ <i>unknown or unproven mitigation; or</i> ● <i>a factor for the justification in the public interest anticipated to be material to decision-making such as a likely positive effect contributing to sustainability, to Canada's environmental obligations or climate change commitments or in supporting governmental priorities, such as reconciliation with Indigenous Peoples.</i> 		
ISC - 01	Impacts on Indigenous reserve lands due to effects of project related traffic	Existing forest service roads along the North Access Route that may be used by the project pass through two Reserves, specifically Binche 2, for 1995 m, and Sisul Tl'ó K'ut 14 for 1533 m. While the proponent has not currently identified any road upgrades required within the two reserves, there would be an increase in traffic during both the construction and operations phase. The need to upgrade the roads in question will be confirmed as project planning progresses.	Physical impacts on environmental receptors, including wildlife, as well as potential impacts on Indigenous people living on reserves or using the reserve lands in question – these impacts would occur through increased dust, elevated noise and light, levels, possible collisions with wildlife, as well as outcomes of potential vehicle malfunctions and accidents.	<p>The roads proposed for use are located on lands for which Indigenous Services Canada is responsible. Indigenous Services Canada has the mandate to ensure protection, environmental stewardship and safety on reserve lands. Further, under ISC's mandate, any non-band use of reserve land requires assessment under <i>Indian Act</i> s.28(2).</p> <p>The proximity of these roads to Indigenous communities and human receptors of effects is a critical consideration. Community members live on the Binche 2 reserve and may be affected both while using the roads and due to broader effects from project road use; while there are no residences on Sisul Tl'ó K'ut 14, there is a lumber mill and its employees, including community members, use the roads. Additionally, members from First Nations with reserves further north use these roads.</p>	<p>The use of these road segments on reserve may result in effects to reserve lands, including the roads themselves and areas adjacent, as well as in effects to the wellbeing of Indigenous peoples, which are effects in areas of federal jurisdiction; the proximity of these project activities may increase the likelihood of significant adverse effects.</p> <p>Further, ISC must determine whether to issue <i>Indian Act</i> s.28(2) permits, which is a federal decision. Permit issuance cannot occur without understanding the extent of land disturbance, potential adverse effects to Indigenous communities, and adequacy of mitigation.</p>	<p>The proponent seems to have committed to obtaining a more detailed understanding of the kinds and volume of traffic on these road segments and how traffic might increase and/or change as a result of the project being constructed, i.e. a comparison of the baseline conditions (pre-project) and conditions during the construction phase and onward. ISC understands that this subject matter is part of engagement and the collaboration between the proponent and the First Nation groups.</p> <p>Permits required under the <i>Indian Act</i> must be informed about the proposed land use and its potential effects and may include mitigation requirements.</p>	<p>Elaborate on the kind of traffic and/or potential traffic increases on the access routes during each phase of the project. As the planning stage of the proposal progresses, disclose and assess the effects of any potential physical upgrades to these road segments.</p> <p>The proponent should provide: (1) precise spatial data and legal land descriptions of all reserve-adjacent or reserve-crossing road segments; (2) detailed descriptions of proposed upgrades and traffic volumes; (3) assessment of potential environmental and cultural impacts on each reserve parcel; (4) proposed mitigation and monitoring plans; (5) results of engagement</p>

							with affected First Nations regarding access, safety, and land-use impacts; (6) timelines and anticipated needs for <i>Indian Act</i> s.28(2) access permits. This information is required to determine if ISC can resolve potential impacts using existing authorities and conditions.
ISC - 02	Biophysical effects on traditional lands of Indigenous Peoples, giving rise to potential impacts on current and future use of lands and on Indigenous rights.	Construction and operation of the project, including ancillary infrastructure, and project activities including mining, transportation, and tailings storage.	The presence and activities of the project may result in changes to the biophysical environment – such as to changes to the presence, availability, and health of wildlife species of cultural and/or economic important – and thereby affect Indigenous peoples use of these resources, which in turn has effects on their social and economic conditions.	Indigenous Services Canada’s mandate includes supporting the social and economic wellbeing of Indigenous peoples. The proposed project has potential for adverse effects on a variety of environmental receptors, due to its significant size and complexity as well as its location. For example, due to the location the project may result in effects on caribou populations/habitat, with caribou being a species of special importance to the Indigenous groups in this region. Further land and resource use is integral to culture, social relations, and economic wellbeing; a project of this magnitude is likely to result in complex pathways of effects to each of these.	These potential effects are within federal jurisdiction, as non-negligible adverse effects to the social and economic conditions of Indigenous peoples.	Continued community engagement to identify relevant valued components, assessment methodologies, and mitigation measures.	In preparing the Impact Statement Guidelines for this proposed project, consider requiring detailed information and maps to illustrate the overlay of project area and regional study area with the protected caribou habitat, plus the known territories of the involved Indigenous groups; ISC understands that the related rights may be evolving, as the groups are in advanced stages of treaty negotiations with the province. Additional information requirements should be developed in consultation and engagement with affected communities.
ISC - 03	Cumulative effects	The Prince Rupert Gas Transmission project, a gas pipeline, is expected to run through the Baptiste Nickel mine project area. The pipeline, provincially regulated, has been deemed substantially started (June 2025) and is under construction.	There is an oil and gas pipeline reserve/notation (6408710) and right-of-way (9708459) overlapping with the Baptiste Nickel mine site. It is held by the provincial Ministry of Energy, Mines and Low Carbon Initiatives and Prince Rupert Gas Transmission Ltd., respectively. Combined with the anticipated construction of the nickel mine, potential exists for cumulative effects, for example on vegetation, soil, wildlife and other receptors.	Potential interaction between the biophysical effects of the proposed nickel mine, its associated infrastructure and the gas pipeline corridor could give rise to cumulative effects, with such effects occurring on traditional Indigenous lands. At present, the IPD for Baptiste Nickel contains very little information about the gas pipeline, for example about the timeline for its construction and	Related cumulative effects may include cumulative effects to the social and economic conditions of Indigenous peoples.	ISC can help address cumulative effects by supporting Indigenous communities through capacity funding that enables participation in project reviews and ongoing monitoring, such as through programs that support consultation capacity, land and environmental management, or community-based monitoring initiatives. ISC can also provide support	The noted pipeline should be included in the cumulative effects assessment as an existing development.

				<p>how it might – or if it might - interact with the construction phase of the nickel mine.</p>		<p>for community protection and infrastructure needs where overlapping developments may affect drinking water, wastewater systems, or emergency management preparedness. These existing funding pathways help ensure communities have the capacity, information, and technical support required to understand and respond to cumulative effects associated with the mine and natural gas pipeline.</p>	
<p>ISC - 04</p>	<p>Social and economic conditions of Indigenous peoples.</p>	<p>Construction and operation workforce requirements.</p>	<p>The proposed project will result in the influx of a large workforce population which can have varied and complex effects on the social and economic conditions of Indigenous communities. Further, the participation of Indigenous individuals in this workforce may result in varied opportunities and challenges, and associated positive and negative effects to social and economic conditions.</p>	<p>Safety related effects are typical for extractive and development industries, as noted in the Reclaiming Power and Place: The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls. Further, employment equity is typical concern for such projects. However, context – such as the scale of the project and the existing and transitioning economy in the region – may result in distinct effects that warrant consideration.</p>	<p>These potential effects are within federal jurisdiction, as non-negligible adverse effects to the social and economic conditions of Indigenous peoples.</p> <p>Additionally, while economic benefits of the project to Indigenous communities, enabling policies, conditions, and supports are required; accurately assessing potential benefits to Indigenous peoples, would support a justification decision if the process requires one.</p>	<p>The IPD references some related concerns raised by Indigenous groups (e.g. training, workplace safety, employment opportunity disparity) but does not indicate firm commitments beyond continued engagement. Further the IPD does not mention or include any commitments related to workforce, safety, and Indigenous women, girls, and gender-diverse people.</p>	<p>A culturally appropriate gender based analysis, developed in consultation and engagement with affected communities.</p> <p>An assessment of employment opportunities for interested members of Indigenous communities, including an analysis of qualification requirements and training needs.</p> <p>Detail on proponent commitments to safe workplaces and community safety more broadly.</p> <p>An assessment of project effects on social infrastructure.</p>

Please insert additional rows as necessary.