PART A – Summary of Issues – Prairie Lights Power Station

Introduction

Prairie Lights Power GP Inc. is proposing the construction, operation and decommissioning of a 360-megawatt natural gas-fired power generation facility that would deliver electricity to Alberta. The proposed Prairie Lights Power Project would be located 35 kilometers south of Grande Prairie, within the Municipal District of Greenview, Alberta.

The Detailed Project Description should serve to better understand the purpose of the proposed project and show how it connects with gender equality and broader inclusion goals. Ideally gender equality and inclusion issues should be found in all sections of the report rather than mentioned only in a specific section on gender. Having said that, the proponent may wish to include a specific section to highlight the relevance between the energy sector, gender equality and inclusion in addition to embedding these considerations through all sections of the report.

In the energy sector, women, men, gender diverse persons and people from a range of groups and communities can often have vastly different experiences of the risks, benefits and impacts of energy projects – from access to benefits in terms of jobs, compensation and community investment; to decision making roles for new energy technologies; to access to finance to pay for electricity services.

Following a review of the Proponent's Initial Project Description, the following are the Department for Women and Gender Equality's (WAGE) key suggested areas/issues for the proponent to consider as it prepares its Detailed Project Description for an impact assessment of the Project.

Gender-based Analysis Plus (GBA+)

GBA+ is a process for examining how different groups of women, men and gender diverse people may experience government initiatives. The "plus" in GBA+ acknowledges that a complete assessment of impacts must go beyond binaries of biological (sex) and socio-cultural (gender) differences and also consider many other intersecting identity factors that influence the whole person. These include race, ethnicity, religion, age, mental or physical disability, sexual orientation, geography, language, income and education.

GBA+ should be undertaken throughout the entire process of an initiative's lifecycle, from the identification of the problem/opportunity through to the evaluation of the project's impacts. GBA+ is integral to any strategy for the creation of inclusive initiatives because it helps improve the predictability of outcomes and minimize unintended consequences.

Conducting a GBA+ of an initiative can reveal differential impacts or unintended barriers, prompting the development of mitigation strategies to strengthen the initiative, thus helping promote equity. Similarly, equity considerations should be used throughout the design and implementation of the engagement processes to ensure inclusiveness.

GBA+ informed analysis will:

• Consider, for example, who does what, who owns what, who has access to and controls what, who benefits, and who should be included;

- Examine the wider social, legal and economic environment where rules, norms and routines in organizations or in other societal structures become obstacles for certain groups or individual;
- Assess intersectional factors, with the objective to identify and understand people that are most
 marginalized due to compounded identity factors e.g., project impacts on not only women but
 women with disabilities or older men; and
- Allow for the identification of potential impacts or unintended negative impacts on most marginalized groups.

Informing the design of the Prairie Lights Power's proposed project should include analysis that includes an assessment of existing data to create a diagnostic of the current environment, the analysis should look not only at demographics but also information on socio-economic conditions, cultural trends, including relevant laws and policies in order to obtain a context-specific analysis. For example, the project can include an overview of the legal framework, both informal and formal, such as relevant labour laws, searching for provisions that guarantee equality before the law. Analysis should also be complemented with qualitative information that can be generated through consultation with an emphasis on groups that may not actively engage on their own. The Detailed Project Description could also include information on the explicit effort that will be made to identify activities and investments to narrow the gender gaps and other disparities. The project proponent could also include how they plan to monitor impacts of the project on specific populations. The goal is to reveal inequalities and design mitigation strategies. Finally, by monitoring the actual effects on populations, the project proponent can make adjustments required to avoid adverse gender impacts or increased exposure to risks for specific groups. Additional information on GBA+ and diversity analysis is available at the following: https://researchgroups.usask.ca/reed/documents/CEAA%20Report.FINAL.%20Walker%20Reed%20Thiessen.%20Gender% 20Diversity%20in%20IA.Feb%208%202019.pdf

Documenting the context – creating a baseline

As the proponent develops the Detailed Project Description, there would be a need to document the current local context. A thorough context analysis will help understand the communities that will be affected by the project. This would include basic data on gender and poverty, composition of households, division of labour, the differential situation of women and men vis-à-vis key indicators (such as literacy, land access, participation in agriculture, political participation). The demographic and socio-economic information should be disaggregated at minimum by sex, age and ethnicity. Where possible data should be further disaggregated to include information such as Indigeneity, religion, education levels or disability. Extracting this data normally involves consulting a range of sources, such as government statistics, administrative reports or previous studies. If data gaps exist, this should be mentioned up front in the project description and additional steps should be taken to fill gaps in information.

One way to identify relevant information is to hold meetings or working sessions with local level organizations serving specific populations. These community-based entities are well placed to point to data and may be able to broker relationships in the community allowing for engagement of specific groups. Information may also be collected purposely for the project being designed (primary data) through a range of data collection instruments such as needs assessments, surveys or purposively through focus group discussions or interviews (more information is included under public engagement).

A detailed overview of the target group(s) and local context is necessary in order to clearly identify the segments of the population that will either benefit or be negatively impacted by the project. Be it

individuals, groups and legal entities to whom the project is targeted (direct beneficiaries) or, individuals who, even though the project is not directly targeted at them, can be affected by its implementation. There are very few cases, if any, that a project is considered gender neutral where there are no differential positive or negative impacts for gender equality.

Insufficient disaggregated data

There is some concern with the Initial Program Description related to the lack of detail in the data provided by the Proponent. For example, the Proponent's Initial Project Description provided some demographic information (e.g. medium averages) of the nearest communities in the Municipal District of Greenview No. 16 in the project area, however few details were provided on the populations (e.g. disaggregated data by sex or ethnicity). This may provide an inaccurate assumption of the population's homogeneity and that all individuals in these communities are impacted equally. Disaggregated baseline information is essential to demonstrate changes over the life of the project and provides a reference point for assessing gender equality results. The quantitative information, including gender sensitive data, should also be complemented by qualitative insights from studies or consultations, and from various sources. For example, there should be a detailed profile of the socio-economic conditions of the households and communities that may be affected by the project.

Public engagement and decision making

Even if the project is located in a relatively sparsely populated area of northwest Alberta, consultations with various groups and individuals are also an important element of the GBA+ process. Although the Proponent's Initial Project Description outlined the consultation and engagement activities undertaken, as well as plans for future engagement, further detail on the nature of these consultations and participants is required to ensure transparent and inclusive processes. Companies often fail to adequately consult with women or diverse groups when negotiating access to land, compensation or benefit-sharing agreements. This can disempower and disadvantage individuals and groups, and may also undermine traditional decision-making structures. Communities also have different social, economic and political conditions that combine in different ways to enable or constrain women's agency and leadership. It is important to understand decision making abilities of individuals or groups in the local area — not only who, but also the different kinds of decisions people, make, particularly related to the use of resources.

GBA+ is a useful tool for more inclusive engagement as it involves reaching the voices that are often overlooked. This will ensure that the views of those being affected by the proposed project, directly and indirectly, are heard. Stakeholder mapping is a useful method to assess stakeholder groups and identify the opportunities and barriers affecting the participation of different stakeholders that may be marginalized. For example, among Indigenous groups, particular efforts should be taken to engage with women, elders, youth and people living with disabilities and/or with community-based organizations with local knowledge and relevant mandates. Generally, stakeholders, partners or groups affected by the project should be consulted. Each group should consist of different interest subgroups based on interconnected identify factors or categories, such as geography, gender, ethnicity, socio-economic status, etc. Furthermore, opportunities to enhance diverse representation may exist should the project require participation of diverse groups in local decision making bodies.

Social needs and well-being

Including diverse perspectives in engagement and consultation processes supports the identification of different needs, particularly as it relates to social needs such as health services, social services or child care. While data and research can help in this regard, engaging community members helps ensure that the specific needs of men, women and diverse groups of people are understood (e.g. women's differential needs may relate to biological conditions such as menstrual hygiene or sex and pregnancy related needs). The design of instruments to gather information from the public should be shared and validated (potentially with community-based organizations serving GBA+-related populations). Enquiry may require 'outside the box' thinking as the project may have unintended impacts on groups that may not be the primary focus of the initiative. For example, the influx of population during the construction of the facility could reduce access to services that address people's specific needs and ultimately restrict their options and potentially compromise their health. For example, certain groups may be more affected than others by the increased demands on community services? The influx of new residents could increase the cost of homes that can also disproportionately affect certain groups.

The Detailed Project Description should include information on what was heard through the engagement/consultation process. The preferences of women and various groups that may face barriers to project benefits or may be disproportionately impacted by the negative effects of the project (e.g. Indigenous communities, persons living with disabilities). Information on the steps taken by the proponent to positively impact the community or measures taken to mitigate for risks identified by certain populations.

With a strong diagnostic in place, the proponent can identify clear inclusion-related goals and progress markers that can be pursued and monitored. This, in turn can help support the business case for proceeding the project.

Access and control over resources

Access to vital energy sources for lighting, heating, transport, and economic production can significantly improve livelihoods, contribute to productivity and increase economic opportunities for society at large. However, in order for the energy sector to be sustainable and inclusive, the design of projects need to be responsive to the needs of men, women and diverse groups of people. Women, the poor, Indigenous Peoples can all be invisible as energy consumers regardless of the division of labour or the role they play in terms of household energy managers and/or agriculture producers.

The project proponent may wish to include information on how access and affordability of energy will be impacted by the implementation of the proposed project. Will the project help yield positive social impacts through sustainable infrastructure and improvements to the quality of the power supply and/or service. Will the project have an impact on the affordability of electricity? Are there other potential improvements to the quality of life of consumers? In addition to upgrades to energy distribution and/or greater affordability, other potential positive impacts for women, men, gender diverse populations in all

their diversity should be included in the Detailed Project Proposal. For example, will roads and secondary centres see improvements to their infrastructure?

In addition, to understand the constraints and barriers faced by certain women, men, gender non-binary and diverse groups of people in access to and use of resources, such as information and knowledge or services, the proponent may want to understand people's decision making abilities, particularly on the use of resources. Similarly, while street lighting can reduce women's vulnerabilities or risks and improve their safety and mobility, women and diverse groups often do not have the opportunities to voice their needs and priorities. A GBA+ can help identify gender-differentiated impacts and potential opportunities for diverse peoples.

Economic Opportunities

Capturing economic opportunities made possible by improved energy access is often limited for women and for a range of diverse groups. Moreover, social norms, broader social power structures, and a country's legal framework can impact women, men and diverse groups of people's ability to equally benefit from the employment opportunities in the energy sector. The Initial Project Description does not outline employment rates in the area nor does it describe the level or nature of unemployment in the local area (e.g. people with low levels of educational attainment, specific sectors). While the Initial Project Description outlines that there will be increased economic opportunities during construction, operation and maintenance of the project, there are no details on the potential for diverse labour force considerations, including women's employment or entrepreneurship opportunities in the energy sector.

As the project proponent develops the Detailed Project Description, information should be included on how women and men and diverse groups of people are employed either as wage earners in the labour market or in customary livelihood occupations. This is particularly relevant for rural and Indigenous communities where "pluri-activity" often characterizes household incomes. The proponent may wish to include information on what potential it has for increasing employment for women and other underrepresented groups in the sector and for local workers more generally. The proponent may wish to identify measures that will be undertaken to support the recruitment, development and retention of these workers. Information on the training opportunities that will be made available for prospective workers may also be of relevance. This could include collaboration with local learning institutions to deliver training targeted to these populations. Measures related to the supply-chain may also be considered like, for example, the creation of incentives or criteria that favour suppliers with inclusive workforces.

Consideration could also be given as to how the project can have positive implications on the local economy more broadly. This can include for example, as it relates to supplying food, accommodations or potentially as it relates to purchasing construction materials.

Prairie Lights Power GP Inc. may also wish to describe its own workforce development plans as they relate to inclusion. For example, is there a gender or diversity and inclusion specialist on staff? Is gender and diversity training available to employees and management? Is the work environment sensitive to gender and inclusion issues? What is the composition of the current workforce composition and what is being done to address underrepresentation of certain groups? Does Prairie Lights have a Gender, Diversity and/or Inclusion Action Plan?

Gender-Based Violence

Inevitably, energy sector projects can also generate and result in increasing migration and influx of transient workers. Men remain over-represented in this workforce. These changes can also bring increased risks, such as sharp increases in land prices; greater spread of sexually transmitted infections and HIV, and gender based violence (e.g. human trafficking). Women are often disproportionately affected by these risks.

Risks and negative impacts can be experienced by groups that are not specifically targeted by the project. Gender based violence (GBV) is a persistent problem in all societies and should be explored in the assessment, for example, ensure that contractors take measures to prevent sexual harassment and GBV. The Initial Project Description does not include mention of programs to support the safety and security of people such as, codes of conduct, and engage men as change agents - arguably one of the most challenging aspects of promoting gender equality. The proponent should include background information on GBV in the impacted communities and how project interventions may have unintended impact or increase risk in the development of the Detailed Project Description. For example, will the temporary infrastructure required during construction such as worker camps include dormitories and washroom facilities that are safe spaces for all workers?

Conclusion

While GBA+ should be embedded throughout the Detailed Project Description, a specific section that summarizes key issues and identifies mitigating measures to address these issues can be useful as it helps form the basis for a GBA+ implementation framework. It is recommended that key issues and practical measures be prioritized, rather than devising an exhaustive list that might not be realistic to implement. Underpinning these key actions with indicators of success and monitoring progress regularly also helps institutionalize gender equality and inclusion in the project management.