

ATTACHMENT:**Federal Authority Advice Record****Response due by March 23, 2020**

[Base Mine Extension Project – Suncor Energy Inc.].

Agency File: 005721

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Department/Agency	Women and Gender Equality Canada (WAGE)
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1. Is it probable that your department or agency may be required to exercise a power or perform a duty or function related to the Project to enable it to proceed?

If yes, specify the Act of Parliament and that power, duty or function.

WAGE does not hold any regular power, function or duties

2. Is your department or agency in possession of specialist or expert information or knowledge that may be relevant to the conduct of an impact assessment of the Project?

Specify as appropriate.

WAGE holds expertise in the application of GBA+ and intersectional analysis as well as information related to gender-based violence

3. Has your department or agency considered the Project; exercised a power or performed a duty or function under any Act of Parliament in relation to the Project; or taken any course of action that would allow the Project to proceed in whole or in part?

Specify as appropriate.

N/A

4. Has your department or agency had previous contact or involvement with the proponent or other party in relation to the Project? (for example, enquiry about methodology, guidance, or data; introduction to the project)

Provide an overview of the information or advice exchanged.

No

5. Does your department or agency have additional information or knowledge not specified, above?

Specify as appropriate.

No

6. From the perspective of the mandate and area(s) of expertise of your department or agency, what are the issues that should be addressed in the impact assessment of the Project, should the Agency determine that an impact assessment is required?

For each issue discussed, provide a concise, plain-language summary that is appropriate for inclusion in the Summary of Issues.

See attachment

Denise Gareau

Name of departmental / agency responder

Director, Policy and External Relations

Title of responder

Signature

Date

PART A – Summary of Issues – Suncor Base Mine Extension Project

Introduction

Suncor Energy Inc. is proposing to develop the Base Mine Extension Project to sustain the supply of bitumen to the existing upgrades at Suncor's Oil Sands Base Plant operation. The project would extend the life of its base oil sands facilities when the existing mines are depleted. The Project is located adjacent to existing Base Plant operations approximately three kilometers north of Fort McMurray, Alberta, within the Regional Municipality of Wood Buffalo.

In the extractive industries, including with mining projects, 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 projects – from access to benefits in terms of jobs, compensation or benefits and community investment; to decision making roles for new innovation and technologies; to access to services and programs that account for the perspective, knowledges and experiences of diverse individuals and communities.

The Impact Statement, which is a detail technical document as per the requirements set out in the Tailored Impact Statement Guidelines, 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 Impact Statement document rather than mentioned only in a specific section related to gender. Having said that, the proponent may wish to include a specific section to highlight the relevance between the extractive industry and mining sector, gender equality and inclusion in addition to embedding these considerations through all sections of the document.

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 Impact Statement using a Gender-based Analysis Plus (GBA+) lens to understand the differential impacts of extractive industries on diverse populations.

Documenting the context – creating a baseline

As the proponent prepares the Impact Statement, there would be a need to document baseline information about the community potentially impacted by the project. This would include basic data and gender analysis as it relates to the social, economic and health impacts, such as 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, 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 Impact Statement and additional steps should be taken to fill gaps in information. For instance, while there is a rise in census participation from Indigenous communities, the information may not always be available or shared.

Insufficient disaggregated data

The Initial Project Description has identified a relatively diverse and young population in the region, however, a detailed overview of the target group(s) and local context will be necessary in the Impact Statement. This will allow to clearly identify the segments of the population that will either benefit or be negatively impacted by the project. For example, the Proponent's Initial Project Description provided a list of the Indigenous communities in the project area, and some information on the communities the proponent has consulted with thus far, however no detail on the sex and age of those populations was provided. This may provide an inaccurate assumption of the population's homogeneity and that all individuals in these communities are impacted equally. Disaggregated baseline information will be essential in the Impact Statement to demonstrate changes over the life of the project and to provide 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, the Impact Statement should provide 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 populated area of northeast Alberta, consultations with various groups and individuals are 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 (e.g. interviews, focus groups, meetings, etc.) and participants may be required in the Impact Statement 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. In addition, language and information materials should be accessible all. 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 and cultural specificities that combine in different ways to enable or constrain women's agency and leadership. It is important to understand decision making processes and 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.

Social needs and well-being

The Impact Statement should include information on what was heard through the engagement or consultation process on 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 or social services. For example, when barriers are identified to women's participation, such as lack of child care services, measures can be considered to provide childcare services or creating child-friendly spaces during meetings. Similarly, men gain employment in mine projects and withdraw their labour from traditional subsistence activities, such as hunting fishing gathering and/or trapping, which can create – and exacerbate existing – gender inequalities in the communities.

Topics raised by Indigenous groups in the Initial Project Description include the potential impacts to health status and Indigenous community health. While data and research is important in this regard, the Impact Statement will also need to demonstrate how 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). Another example is 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. Certain groups may be more affected than others by the increased demands on community services.

Similarly, the Impact Statement should identify if it will help yield positive social impacts through sustainable infrastructure and improvements to the quality of services. Whether the project may have an impact on the affordability of homes and any other potential impacts to the quality of life for communities. For example, when health centres see improvements to their infrastructure and service delivery. These potential positive or negative impacts for women, men, and diverse populations should be included in the Impact Statement.

Access and control over resources

Access and control over resources is concerned with both the availability of resources, and the benefits that come from the use of these resources. The extractive industry has fewer opportunities for women than men for education and training, economic participation, and less diverse representation on company boards. The project proponent may therefore wish to include information in the Impact Statement on how access to and use of resources will be impacted by the implementation of the proposed project.

In order for the project to be sustainable and inclusive, the Impact Statement may want to identify resources in the community, and then understand who accesses these resources. For example, if traditional livelihoods are affected and women are unable to access employment due to skill shortages, the project can consider ways to support women's employment in the extractive industry or hire businesses owned by local and/or Indigenous women in the supply chain.

In addition, to understand the constraints and barriers faced by certain individuals or groups in access to and use of resources, including access to information and knowledge or services, the Impact Statement may want to understand people's decision making abilities about development in

the community, particularly on the use of resources. Similarly, while paved and well-lit roads and walkways can improve women's safety and mobility, these groups often do not have the opportunities to voice their needs and priorities. An Impact Statement can provide information on how the project intends to support culturally sensitive participation of women and diverse groups in decision making.

Economic Opportunities

Economic opportunities and access to the financial benefits of mining projects 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 extractive industry sector. The Initial Project Description intends to generate significant benefits and opportunities for local and Indigenous communities. However it does not describe who from the communities would benefit as there are no details on the potential for diverse labour force considerations, including women's employment or entrepreneurship opportunities in the mining sector. It also 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).

As the project proponent develops the Impact Statement, 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 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 under-represented 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 local suppliers. 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.

The proponent may also wish to describe in the Impact Statement its own workforce development plans as they relate to diversity and inclusion.

Gender-Based Violence

Extractive industry sector projects can generate and result in increasing migration and influx of transient workers. Men remain over-represented in the extractive industries. The Initial Project

Description has identified a relatively large shadow (e.g. non-resident) population housed in temporary worker dwellings (e.g. camps), residential accommodations (e.g. houses, apartments), and non-residential accommodations (e.g. hotels, motels) when working in the region. The Impact Statement will need to explore how these changes can also bring increased risks, such as greater spread of sexually transmitted infections and HIV, and gender based violence (e.g. sexual harassment, violence against women, human trafficking) which can make women feel less safe in their homes and communities. The Impact Statement will need to identify vulnerable groups among women (e.g. Indigenous, younger women) who are often disproportionately affected by these health and safety risks, including intimidation and discrimination. Risks and negative impacts can also 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, to ensure that the proponent and worksite contractors take measures to prevent sexual harassment and violence. The Impact Statement should include an overview of the legal framework, such as relevant labour laws and policies related to GBV. For example, Canada's laws governing domestic violence and the jurisdictions to address the problems may differ province to province. In Alberta, for instance, emotional abuse and financial abuse are not included in the Protection Against Family Violence Act, which allows survivors to get protection orders. Both forms of abuse are, however, included under the Employment Standards Act. The Impact Statement should also consider mitigation measures such as programs to support the safety and security of people, including codes of conduct, and programs to engage men as change agents - arguably one of the most challenging aspects of promoting gender equality. For example, temporary infrastructure and accommodations required during construction such as worker camps should include dormitories and washroom facilities that are safe spaces for all workers. The proponent should include in the Impact Statement background information on GBV in the impacted communities and how project interventions may have unintended impact or increase risk in the development of the project.

Conclusion

While GBA+ should be embedded throughout the Impact Statement and Impact Assessment, 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.