

VCS Tailored Impact Statement Guidelines - Disposition Table

Response requested by: **May 17, 2021**

Department/Agency:	Indigenous Services Canada		
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16,	Page	Issue (i.e. rationale, including if critical or recommended, project-specific or general)	Suggested edit (show original text with Track Changes)
General Comment	N/A	Revise to include cultural conditions when discussing environmental, health and socio-economic impacts or effects.	i.e. 3.3 Regulatory Framework Municipal, regional, provincial and/or national objectives, standards, regulations or guidelines, by-laws, or ordinances that have been used by the Proponent to assist in the evaluation of any predicted environmental, health, cultural or socio-economic effects or impacts.
General Comment	N/A	Revise where needed, regarding the inclusion of two-spirited peoples when discussing underrepresented groups.	i.e. 3.5 Workforce Requirements The information must be presented in sufficient detail to analyze how vulnerable or underrepresented groups will be taken into account, including Indigenous groups and other relevant community subgroups (e.g., women, youth, two-spirited peoples and seniors)
3.4 Project components and activities	6	6 th bullet.. Impacts should consider both Indigenous peoples and Indigenous people's rights.	...highlight activities that involve periods of increased disturbance to environmental, health, social and economic conditions or impacts on Indigenous peoples, and the rights of Indigenous Peoples as articulated by UNDRIP (https://www.un.org/development/desa/indigenouspeoples/declaration-on-the-rights-of-indigenous-peoples.html)
3.5 Workforce Requirements	8	Section should be revised in order to clearly highlight training programs, employment opportunities and youth incentives for Indigenous peoples.	<ul style="list-style-type: none"> workplace policies and programs for Indigenous employment, training, and contracting, workforce diversity and employment of women and other underrepresented groups; employee assistance programs and benefits programs; and workplace policies and programs, including codes of conduct, workplace safety programs and cultural training programs.

			Workforce requirements must take Gender Based Analysis Plus (GBA+) ¹ into consideration (see also section Error! Reference source not found. Error! Reference source not found.). The information must be presented in sufficient detail to analyse how vulnerable or underrepresented groups will be taken into account, including Indigenous groups and other relevant community subgroups (e.g., women, youth, seniors, and Elders).
4.4 Alternative means of carrying out the project	10	Revise to include <i>access to traditional lands</i>	...access to the project site; including access to traditional lands for ceremonial purposes, hunting, harvesting, or fishing
5.2 Analysis and responses to questions, comments and issues raised	12	2 nd bullet Include reference to <i>Indigenous groups</i> .	describe any questions and comments raised by the public and Indigenous groups, and how they influenced the design, construction or planned operation of the project;
6.2 Record of Engagement	14, 15	Engagement activities and strategies should be described to demonstrate if/how the Indigenous groups were involved with the development and delivery of materials and furthermore describe how the proponent ensured that the materials were received in a meaningful format that was well understood in order to effectively participate and respond.	This comment applies to this section, but also throughout the TISG. The proponent should clearly articulate how the materials were presented and if collaboration and/or community based methods were used to create and present the materials.
6.2 Record of Engagement	14, 15	Indigenous procurement strategies should be described and articulate how the proponent worked with Indigenous groups to develop appropriate strategies.	This comment applies to this section, but also throughout the TISG. Indigenous procurement and labour hiring strategies should be clearly articulated and also include plans for post project (i.e. career development for transferrable skills).
6.3 Analysis and response to questions, comments and issues raised	16, 17	Participation accommodations should be described.	Details on how the proponent made efforts to ensure that those who wanted to participate, could (describe access, locations, scheduling that accommodated a wide range of schedules and cultural considerations, etc.)

6.3 Analysis and response to questions, comments and issues raised	16, 17	Revise to clarify how Indigenous groups were engaged in the information recording stage.	Information which should be included: Were they given the opportunity to review and ensure that it reflected how they viewed the information sharing sessions?
9. Human health conditions	61	6 th bullet.. Revise bullet	..provide baseline concentrations of contaminants in ambient air, drinking water, soil and tissues of country foods (traditional foods) consumed by Indigenous peoples and local communities. For collection of samples, including but not limited to game and plants, the proponent should work with local Indigenous peoples where appropriate
9.2.1	64	Revise bullet to include <i>access</i>	describe changes in terms of access , availability, use, consumption and quality of country foods (traditional foods), and the potential effects related to these changes on physical and mental health of communities, including for Indigenous peoples;
10.4 Community well-being	69	Revise bullet to include food <i>sovereignty</i>	food sovereignty and food security, access to country foods (traditional foods) and baseline perceived quality;
10.4.2 Effects on community well-being	69	Add a bullet to describe food safety concerns (add before bullet on <i>..effects on food security</i>)	describe any food safety concerns from indigenous communities resulting from potential exposure to contaminants
11.1. Economic Conditions – Baseline Conditions	69	Ensure that the statistics and indicators provided to form the baseline do not omit the known baselines for Indigenous communities that may be impacted by the project	Provide an overview of the existing employment rates and economic well-being in the study area and impacted communities including average income and wage inequality, including these indicators for Indigenous communities.

11.2.3. Procurement	71	Maintain the focus on what the project procurement opportunities could mean for existing Indigenous-based businesses that exist in communities within the project study area, and how access to procurement opportunities can be encouraged.	Describe plans to encourage procurement and contracting opportunities for Indigenous based or Indigenous owned businesses in the communities, including involvement of diverse groups (women, youth, elders, two-spirited peoples).
12.2.1 Baseline conditions	79	5 th bullet Revise to include description of country foods	description/list of country foods (traditional foods) that are fished, hunted, gathered, and harvested;
12.3.2. Effects on Indigenous health, social and economic conditions	79	This point is valid, however the use of the description 'remote' does not seem to fit the profile of the region where the project would be. The Heartland Complex is not far from Edmonton - the region and its Indigenous communities, in the Alberta context, do not qualify as remote). Note: there may be known impacts on smaller sized rural communities, affected by the quoted boom-and-bust economic cycle.	The Impact Statement must include: Consideration of how economic boom and bust cycles in remote (<u>suggest an alternative wording to 'remote' such as 'small' or 'rural'</u>) communities impact the local economic wellbeing, as well as social and cultural wellbeing.
12.3.2 Effects on health, social and economic conditions	82	Revise to include <i>access and quality</i> of country foods	describe effects to the access , availability, quality , use, consumption and quality of country foods (traditional foods), including from the release of contaminants and other
12.4.1 Baseline Conditions	80	Revise the following point to include note on authorization on use of information obtained from Indigenous communities.	The description should include maps, when available and authorized , to illustrate the location of treaties, traditional territories and Métis harvesting zones;

