## VCS Heartland – Draft Tailored Impact Statement Guidelines

## WAGE Comments

Title of Section	Current text	Proposed edits
Social Conditions (Section 10)	<ul> <li>Baseline information is required on existing social conditions and must include social well-being and social activities for individual communities and Indigenous peoples. The scope and content of the social baseline conditions should be tailored to the specific project context, take into account community and Indigenous input, and should include indicators and information that are useful and meaningful for the effect's analysis.</li> <li>In preparing a baseline for the social context, the Proponent must identify the social area of influence of the Project and prepare a community profile.</li> <li>The information provided must: <ul> <li>describe the demographic information for the region, including descriptive statistics (age, ethnicity, sex and gender, language); and</li> <li>provide a comparison of data at the provincial, regional or national level, if possible, to better interpret baseline health and social conditions.</li> </ul> </li> <li>Within the context of the project on social conditions. Interconnections between social VCs and other VCs and interactions between effects must be described. The degree of confidence must be discussed in the analyses.</li> <li>In consideration of effects, the Impact Statement must document and take into account tolerance thresholds for potential adverse effects identified by Indigenous groups.</li> </ul>	(Please add the following text) Describe baseline social conditions using disaggregated data to understand different access to resources, opportunities and services for diverse groups and subgroups (e.g., women, youth and elders) within the community to support GBAPlus; and describe the baseline conditions for each Indigenous community, applying GBAPlus, and taking into account community members who are considered particularly vulnerable to changes resulting from the project.
Baseline Economic Conditions (Section 11.1)	The economic baseline must document the local and regional economic conditions and trends based on the spatial and temporal boundaries selected.	(Please add the following text) Describe baseline economic conditions for diverse subgroups
	The Impact Statement must:	(e.g. women, youth, and elders)

<ul> <li>describe the main economic activities in the study area;</li> </ul>	within the community to
<ul> <li>provide an overview of current labour market statistics, including jobs likely to be</li> </ul>	in support GBAPlus. Information on those likely to be directly or
demand over the life of the Project;	indirectly affected by the project
<ul> <li>describe the workforce, including the availability of skilled and unskilled workers,</li> </ul>	must be provided taking into
education level, existing working conditions, wages and average salary range, full-	account community members
time and part-time employment and training, and gender gaps such as for skilled trades in wages and qualifications. If the labour force is anticipated to draw beyor	considered particularly d vulnerable to changes brought
the regional labour force, describe this information as well;	about by the project. As
<ul> <li>describe the demographic features of the local and regional population and any</li> </ul>	applicable, baseline economic
prevalent economic concerns and economic aspirations of residents, families and	conditions must be sufficiently
workers in the study area, and for each Indigenous group;	disaggregated and analyzed to support the analysis of
<ul> <li>describe changes in socio-economic conditions and trends for the population as a</li> </ul>	disproportionate effects under
result of oil sands development, including Indigenous community-level changes	GBAPlus, by sex, age and
(e.g. subsistence lifestyle to a wage-based economy, population growth);	ethnicity if possible.
<ul> <li>provide an overview of the existing employment rates and economic well-being in</li> </ul>	
the study area and impacted communities including average income and wage inequality;	
<ul> <li>describe the current use of land and water bodies in the study area, including a</li> </ul>	
description of hunting, trapping, outdoor recreation, use of seasonal cabins, and	
institutions. Consider baseline(s) described under social conditions, as it relates to	
economic conditions;	
<ul> <li>describe any Indigenous and non-Indigenous commercial fisheries and their fishin</li> </ul>	5
areas, including species fished (along with catch rates and fishing days), number o	
licences, value of fisheries and breakdown between domestic vs. international	
fisheries, where applicable;	
identify industrial and commercial sectors;	
<ul> <li>identify monitored or administered forest areas (including forests under agreeme and areas designated for timber sales); and</li> </ul>	
<ul> <li>identify registered or recognized hunting, trapping or guiding areas.</li> </ul>	

Effects to Economic Conditions (Section 11.2)	Within the context of the predicted changes to the biophysical environment, and health and social conditions, the Proponent must assess the adverse and positive effects of the Project on the economic VCs and the distribution of any adverse or positive effects. The assessment of economic effects should take into consideration the temporal scale for construction, operation and beyond, to assess the potential for, and avoidance of, boom-and-bust cycles potentially associated with the Project.	(Please add the following text) Describe baseline economic conditions for diverse subgroups (e.g. women, youth, and elders) within the community to support GBAPlus. Information on those likely to be directly or indirectly affected by the project must be provided taking into account community members considered particularly vulnerable to changes brought about by the project. As applicable, baseline economic conditions must be sufficiently disaggregated and analyzed to support the analysis of disproportionate effects under GBAPlus, by sex, age and ethnicity if possible.
Residual Effects (Section 14)	<ul> <li>After considering the consequences of technically and economically feasible mitigation measures, the Impact Statement must describe any residual environmental, health, social or economic effects of the Project.</li> <li>The Impact Statement must: <ul> <li>characterize the residual effects, even if deemed small or negligible, using criteria and language most appropriate for the effect. If an Indigenous group identifies that there are residual effects to rights, those effects should be carried through for residual effects analysis;</li> <li>consider using the following criteria for residual effects, as appropriate: <ul> <li>magnitude;</li> </ul> </li> </ul> </li> </ul>	(Please add the following text) Where appropriate, information regarding residual effects should be disaggregated by sex, age and other community relevant identity factors to identify disproportionate residual effects for diverse subgroups as per the GBAPlus.

<ul> <li>geographic extent;</li> </ul>
<ul> <li>timing;</li> </ul>
<ul> <li>duration;</li> </ul>
<ul> <li>o frequency;</li> </ul>
<ul> <li>reversibility; and</li> </ul>
<ul> <li>the ecological, health, social and economic context within which potential effects may occur. Context should be described and applied as part of the key criteria above, for example:</li> </ul>
<ul> <li>the sensitivity and importance of affected aquatic and terrestrial species, including species at risk and species of importance for Indigenous peoples;</li> </ul>
<ul> <li>the sensitivity and importance of affected habitats and their functions for wildlife;</li> </ul>
<ul> <li>the potential for disproportionate residual effects for diverse subgroups as per the GBAPlus; and</li> </ul>
<ul> <li>the existence of standards, guidelines and other sources of information to assess effects;</li> </ul>
<ul> <li>describe the extent to which the adverse effects within federal jurisdiction and the adverse direct or incidental effects are significant;</li> </ul>
<ul> <li>justify the choice of criteria used to determine the extent to which these effects are significant. The information provided must be clear and sufficient to allow the Agency, the review panel, regulatory bodies, Indigenous groups and other participants to review the effects analysis;</li> </ul>
<ul> <li>identify and explain relevant sources of information that were used to characterize the extent to which those effects are significant, including views of the public, Indigenous groups, jurisdictions, federal authorities and other participants; and</li> </ul>
<ul> <li>where applicable, specify the likelihood of, or potential for, residual effects occurring, and describe the level of scientific uncertainty associated with the data and methods used in this analysis.</li> </ul>

	<ul> <li>The Agency prepared a technical guidance document for <u>Determining whether a</u> <u>designated project is likely to cause significant adverse effects under the Canadian</u> <u>Environmental Assessment Act, 2012</u>. The best practices described in this document also apply to the extent of signifcance of adverse effects and the assessment of residual effects under the Act.</li> <li>Other sources of best practices may complement the technical guidance from the Agency and be used by the Proponent as reference. For example, regarding species at risk and their habitat, the report <u>NatureServe Conservation Status Assessments: Factors</u> <u>for Evaluating Species and Ecosystem Risk</u> is a reference to evaluate criteria against applicable thresholds.</li> </ul>	
Application of GBAPlus (Section 21.4)	<ul> <li>To support GBAPlus, the information provided in the Impact Statement must:</li> <li>be sufficiently disaggregated to support the analysis of disproportionate effects as per the GBAPlus . As much as possible, without resulting in the identification of individuals, the data must be sub-divided by sex, age and ethnicity and presented distinctly for each Indigenous group and all subgroups forming their communities, including information such as social, economic and health impacts, gender and poverty, division of labour, consideration of key indicators, subgroups within the population.</li> <li>(cont.)</li> </ul>	(Please edit existing text to include the word in red) Be sufficiently disaggregated to support the analysis of disproportionate effects as per the GBAPlus. As much as possible, without resulting in the identification of individuals, the data must be sub-divided by sex, gender, age, and ethnicity and presented distinctly for each Indigenous group and all subgroups forming their communities, including information such as economic and health impacts, gender and poverty, division of labour, consideration of key indicators, subgroups within the population.