

**Comment Form – Draft Permitting Plan and Draft Tailored Impact Statement Guidelines– Federal Review Team**

**Upper Beaver Gold Project**

**Response requested by: March 7, 2022**

All comments should be submitted via the Submit a Comment feature available on the Project’s Canadian Impact Assessment Registry page (Reference #82960 at <https://iaac-aeic.gc.ca/050/evaluations/proj/82960>). Documents can be uploaded using this feature. If you have any difficulties submitting this way, please contact the registry directly at [iaac.registry-registre.aeic@canada.ca](mailto:iaac.registry-registre.aeic@canada.ca). All comments submitted using this table would be posted on the Project’s Canadian Impact Assessment Registry Internet site.

Please note that this will be your final opportunity to make changes to the Tailored Impact Statement Guidelines.

Department/Agency:	Women and Gender Equality Canada		
IA Contact:	a) Primary contact: Denise Gareau	Telephone:	
	b) Alternate Contact: Jessica Bialek	Email:	<Email address removed> <Email address removed>

**Section 1:**

1. Confirm that all applicable legislative and regulatory oversight that may apply to the Project, under the authority of your department, is accurately listed in the Permitting Plan.

**Insert response here:**  
Draft Permitting Plan: <https://iaac-aeic.gc.ca/050/documents/p82960/142687E.pdf>  
WAGE does not hold any regulatory power, functions or duties as it relates to the Project.

2. Indicate whether your department has identified any power that it will be unable to exercise to allow the Project to proceed, in whole or in part. For more information, refer to subsection 17(1) of IAA.

**Insert response here:**  
WAGE does not hold any regulatory power, functions or duties as it relates to the Project.

**Section 2:**

1. Please review the draft Tailored Impact Statement Guideline (TISG) sections that are applicable to your department’s mandate.
2. Using the table below, please describe any issues and include your recommendation for how the final Tailored Impact Statement Guidelines should be adapted to address each issue. Please indicate any recommended **additions or deletions** to the text.

Department – Comment ID	Draft TISG Section	Context and Rationale (provide an explanation of your comments)	Recommendation: provide text to be inserted or deleted. Be specific on the location within the draft TISG that the text would be added/deleted.
WAGE - 01	1.2. Gender-based Analysis Plus (GBA Plus) (p.6)	<p>The GBA Plus section is strong and well written but it does not reflect the evolution of GBA Plus since 2018 when the guidance was originally drafted. The Government of Canada has articulated its commitment to more robust and intersectional approaches to GBA Plus. As such, there are sections of the TISG that should be updated to be consistent with the narrative being used in different contexts.</p> <p>Federal public servants can access the newest suite of tools on GBA Plus on <a href="#">GcConnex</a>, and guidance is available publicly in the methodologies section of the <a href="#">Guidance: Gender-based Analysis Plus in Impact Assessment</a></p>	<p>Suggested changes are in red:</p> <ol style="list-style-type: none"> <li>In the 1<sup>st</sup> paragraph, suggest rephrasing from the current: "For consideration of the intersection of sex and gender with other identity factors (paragraph 22(1)(s) of the Act), the Guidelines will refer to Gender-based Analysis Plus (GBA Plus)." To the following: <b>For consideration of the intersection of identity and other factors, the Guidelines will refer to Gender-based Analysis Plus (GBA Plus).</b></li> <li>Suggest rephrasing the first bullet to: "● be sufficiently disaggregated to support the analysis of disproportionate effects as per the GBA Plus. As much as possible, the data must be disaggregated (e.g., by sex, gender, age, ethnicity, Indigeneity, ability, and any other community-relevant identify factors) and presented <b>both</b> distinctly for each specific group <b>and in an intersectional manner (e.g., Indigenous women, elder Indigenous men)</b></li> <li>Final paragraph should be changed as follows:  From "Quantitative information, including gender sensitive data, should be complemented by qualitative insights" To: Quantitative information, <b>including intersectional equality sensitive</b> data, should be complemented by qualitative insights</li> </ol>
WAGE-02	Section 9.1.5 "Mitigation and Enhancement Measures" under 9.1 "Health Condition" (p.94)	Under Section 9.1.5, it specifically targets Indigenous peoples, but even if the other population in not under federal jurisdictions, GBA Plus is to identify overall population impacted, for which it can be for example, Indigenous and or workers.	<p>Suggested changes in red:</p> <ul style="list-style-type: none"> <li>describe the mitigation and enhancement measures for <b>populations most impacted Indigenous peoples and for each Indigenous community</b>, including: <ul style="list-style-type: none"> <li>Mitigation measures to support the safety and security of people, including ongoing measures to prevent gender-based violence;</li> </ul> </li> </ul>

			<ul style="list-style-type: none"> <li>○ mitigation and enhancement measures that may be put in place to counteract any negative health, economic and social effects on local Indigenous communities as a result of in-migration of workers; and</li> <li>○ mitigation measures to help stabilize the effects of boom-and-bust cycles for improved community adaptation.</li> </ul>
WAGE-03	Section 9.2.2.1 Effects to community well-being (p98)	The current GBV examples are harassment and human trafficking which are accurate but much more includes GBV (neglect, discrimination, physical or sexual violence, etc.). If possible, suggest adding a link.	<p>Suggested changes in red:</p> <ul style="list-style-type: none"> <li>▪ changes to gender-based violence (<a href="#">What is gender-based violence?</a>) e.g. harassment or human trafficking);</li> </ul>
WAGE-04	Section 9.2.3 Mitigation and Enhancement Measures under 9.2 Social conditions (p.100)	When comparing to section 7.5 “Mitigation and enhancement measures” and section 9.1.5 “Mitigation and Enhancement Measures” under 9.1 “Health Condition”, the language does not state the same as section 9.2.3. In section 7.5 and 9.1.5, proposed mitigation and enhancement measure are to be describe, but for section 9.2.3, only mitigation and enhancement measures that will be implemented are to be described.	<p>Section 9.2.3, suggested changes in red:</p> <p>The Impact Statement must describe the proposed mitigation and enhancement measures that will be implemented for all potential effects on social VCs.</p>

Insert as many rows as applicable