

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. 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:	ESDC		
IA Contact:	Jason Maurice	Telephone:	
		Email:	<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:

[ESDC is not involved in reviewing the permitting plan.](#)

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:

[n/a](#)

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.
ESDC - Ontario-Region		The Impact Statement Guidelines for the Upper Beaver Gold Project are comprehensive and include key aspects such as impact on economy, community well-being, social impacts, and cultural and health impacts on Indigenous Peoples and communities.	
ESDC - Ontario-Region	Chapter 1.2 – Gender-based Analysis Plus (GBA Plus) Chapter 1.3 – Preparing the Impact Statement Chapter 18 – Gender-based Analysis Plus p.156	The Impact Statement will include a GBA Plus analysis of impact of the Project, and will also document how the potential impacts of changes to community well-being could be different for diverse subgroups, or other relevant subgroups.	
ESDC - Ontario-Region	Chapter 1.3 – Preparing the Impact Statement	The Impact Statement will also include an analysis of the potential for labour shortages in certain sectors as a result of the Project, which is a key area of interest to the Department given the potential impact/need for Temporary Foreign Workers.	
ESDC - Ontario-Region	Chapter 6 – Description of engagement with Indigenous communities pp. 21 – 29 Chapter 18 – Indigenous	The Indigenous Engagement and Partnership Plan is well developed, inclusive and aligns with the Tailored Impact Statement Guidelines. The communities listed in the Plan are not an exhaustive list but are evergreen as the project evolves. As per the Guidelines, the Plan and the Detailed Project Description submitted by Agnico	

	Participation and Engagement p. 159	Eagle (the proponent), the Indigenous communities consulted during this assessment have grown from those that were initially targeted for engagement.	
ESDC - Ontario-Region	<p>Chapter 9.2 - Social conditions pp. 96 - 101</p> <p>Chapter 9.3 - Economic conditions pp. 101 - 106</p> <p>Chapter 18 – Indigenous Participation and Engagement p. 159</p> <p>Chapter 18 - Social and Economic Conditions p. 161</p>	<p>With respect to the Indigenous Skills and Employment Training Program (ISETP) network in the Temiskaming area, there are a number of Partners that service this area, however, none have specifically indicated any existing partnerships with Agnico Eagle, nor have any specific references to the Upper Beaver Mine been made. While large infrastructure projects have been discussed at the ISETP network table, referrals of information from our involvement in the IAAC process have not previously been conducted. Moving forward, Program Delivery Branch, Ontario Region will incorporate the promotion of the publically posted IAAC information to ISETP, SPF and other applicable partners, in order to support the development of training programming.</p> <p>We note that as a result of the ISETP Network being governed by Indigenous Community Chiefs and Councils, and based on the existing Indigenous Engagement and Partnership Plan, Community Leadership will be involved in the Assessment process in numerous ways.</p>	
ESDC - Ontario-Region	<p>Chapter 9.2 - Social conditions pp. 96 - 101</p> <p>Chapter 9.3 - Economic conditions pp. 101 - 106</p> <p>Chapter 18 – Indigenous Participation and Engagement p. 159</p> <p>Chapter 18 – Gender-based Analysis Plus p.156</p>	We look forward to reviewing the next phase of this project where training initiatives will be made available.	Our recommendation would be to incorporate ESDC’s Apprenticeship benefits and Canada Revenue Agency tax incentives for groups being targeted: Indigenous, women, youth and two-spirited peoples. In collaboration with Ministry of Labour, Training and Skills Development (MLTSD), ESDC/Service Canada can provide information sessions and clinics to facilitate the successful dissemination of information and applications that ensure benefits are applied for and received in a timely manner.

	Chapter 18 - Social and Economic Conditions p. 161		
ESDC - Ontario-Region	Chapter 6 – Description of engagement with Indigenous communities pp. 21 – 29 Chapter 7 – Assessment Methodology pp. 29 – 33 Chapter 18 – Indigenous Participation and Engagement p. 159 Chapter 18 – Public participation p. 160	In the Detailed Project Description, Agnico Eagle has committed to engaging any Indigenous Community that comes forward outside of those identified through their initial planning phase and those that were referred to them initially by the Impact Assessment Agency (e.g. Taykwa Tagamou Nation and Temagami First Nation came forward and have now been included in engagements). The engagement methods listed in the Plan are thorough and multipronged, and will ensure that those stakeholders with and without access to technology can be properly engaged.	
ESDC - SSPB	3.5: Workforce Requirements	The approximate number of employees and contractors to be hired for the construction and operation phases of the project, and whether these positions will be permanent or temporary, should be noted. This would help to evaluate the project’s impacts, as permanent employment is generally of higher quality than contract or term employment.	3.5: Opportunities for employment outlining the anticipated number of full-time and part-time positions to be created, time line for when they will be created (construction or operations phase), whether they will be permanent or temporary, and whether they will be for employees or contractors.
ESDC - SSPB	9.3.1: Baseline Economic Conditions	The TISG should include a commitment to describe, whenever data are available, the local labour market conditions of groups other than women and Indigenous persons that are underrepresented in the labour market, such as visible minorities, recent immigrants, and persons with disabilities, and to explain how the Upper Beaver project may impact them. This is important because improving the labour market outcomes of these groups is a priority for the Government of Canada.	9.3.1: Additionally, with respect to economic conditions applicable to Indigenous peoples, other priority groups (e.g., youth, women, visible minorities, recent immigrants, and persons with disabilities), as well as the general public, the Impact Statement must provide the following if data are available:
ESDC - SSPB	9.3.1: Baseline Economic Conditions	Current unemployment rates should be noted, as this is an important labor market statistic.	9.3.1: existing unemployment and employment rates, including principal employment and economic well-being in the

			study areas and impacted communities;
ESDC - SSPB	9.3.1: Baseline Economic Conditions	<p>A commitment should be made to more explicitly describe the educational attainment of the local labor force, as this may affect the ability to fill newly created job with workers already located in the area under consideration.</p> <p>However, data limitations may exist.</p>	9.3.1: workforce, including educational attainment , the availability of skilled and unskilled workers, existing working conditions, wages and average salary range, full-time and part-time employment and training and gender gaps such as for skilled trades and in wages and qualifications; and
ESDC - SSPB	9.3.3: Mitigation and Enhancement Measures	Measures taken to help employees laid off once the mine is at the end of its lifespan should be described.	9.3.3: Where appropriate, provide details regarding financial liability and compensation as required by regulation or the proponent's commitments in relation to decommissioning or abandonment, including for project employees ;