

Enclosure 3: Review Table for the for Alexandra Bridge Replacement Project - Initial Project Description (IPD)

IPD submitted on March 15, 2022, by Public Services and Procurement Canada and National Capital Commission (the Proponent).

Please use this document to provide comments on the Alexandra Bridge Replacement Project (the Project). The document consists of two tables.

Table 1 will enable you to describe potential project effects.¹ The Impact Assessment Agency of Canada (the Agency) requires detailed advice to inform the Summary of Issues provided to the Proponent pursuant to subsection 14(1) of the *Impact Assessment Act* (IAA). Please refer to prompts in the table to guide your responses.

Table 2 will facilitate the collection of general or editorial comments.

Table 1: Description of the potential effects of the Project

Comment ID	Document Reference	Valued Component	Project Component	Description of the Potential Effect (Context and Rationale)	Powers, Duties and Functions	Risk Characterization Rating	Instructions to the Proponent	Summary of the Issue
Organization and comment number.	(e.g. title, section, subheading, page number).	Identify the valued component(s) —within the mandate of your department, ministry or agency—to which the effect applies.	If applicable, please indicate the project component that could cause the described effect. If the effect is linked to a power, duty or function, please identify the project component that would be regulated, monitored, or enabled by the power duty or function.	For each effect within your mandate (one effect per row), please provide the context and rationale. In your response, please respond to following points: <ul style="list-style-type: none"> Describe whether the Proponent has adequately articulated the effect. Provide rationale. Describe whether the Proponent has identified and adequately articulated mitigation and/or monitoring measures to address the potential effect. Provide rationale. Describe whether the Proponent has adequately articulated the potential for residual effects after mitigation has been applied. Provide a rationale. If the Proponent’s description is inadequate, provide advice on the potential for residual effects. 	Does your department, ministry or agency have powers, duties or functions associated with this effect? If yes: <ul style="list-style-type: none"> Indicate whether the exercise of the associated power, duty or function would <u>mitigate, manage or set conditions</u> that would address the effect. 	Characterize the risk by selecting a rating (from [1] to [6]) for the effect (See Enclosure 4 for definitions)	Provide a specific, actionable request for the Proponent.	Where potential effects have been overlooked or are missing or could be better described and presented by the Proponent, provide a concise synopsis for the Summary of Issues.
ESDC-01	Section 1.1 – Regulatory and Project Terminology; Section 19.3 – Socio-Economic Impacts; Section 4.4- Financial Support for Indigenous Engagement	Employment and Economy	All project components that require hiring of workforce	<ul style="list-style-type: none"> More detail surrounding projected employment opportunities is required to adequately assess the economic benefits stemming from the Project. The Proponent has provided general employment information and figures. Additional information is needed to support the analysis of the project’s immediate and direct positive impacts. This effect could be managed by providing details on employment opportunities; the commitment to maximize positive outcomes for local communities (economic) as well as a detailed hiring strategy. 	ESDC has expertise related to social development, learning, skills development, (un)employment, underrepresented groups, working conditions, and workplace relations. Our expertise in these areas could support the Impact Assessment process during its different stages. However, the ESDC does not exercise a power, nor perform a	3	The Proponent should provide a detailed account of the following information related to local socioeconomic conditions, including: <ul style="list-style-type: none"> The current socio-demographic characteristics of the economic sector workforce of the project; The labour force characteristics by age group and sex (if possible) of all impacted communities including the availability of skilled and unskilled workers, existing working conditions, wages and/or average salary 	

¹ *effects* in this context means changes to the environment or to health, social or economic conditions and the positive and negative consequences of these changes.

					<p>duty, or a function related to a specific Project to enable it to proceed.</p> <p>In general, the Minister's powers, duties and functions extend to and include all matters relating to human resources and skills development in Canada or the social development of Canada over which Parliament has jurisdiction and which are not by law assigned to any other Minister, department, board or agency of the Government of Canada.</p> <p>Should any such activities or physical works occur within the jurisdiction of federally regulated industries and workplaces, the <i>Canada Labour Code</i> (CLC) would apply in the private sector (Parts I, II, III and IV). Labour standards such as minimum wage, hours of work, working conditions and fairness in the workplace depend on legislation such as the CLC. ESDC's Labour Program administers and enforces these and other laws and regulations to ensure that all federally regulated workers are treated fairly and receive proper compensation.</p>		<p>range, full-time and part-time employment and training;</p> <ul style="list-style-type: none"> • Better describe the anticipated number of jobs (and not person-years) created throughout the project, along with type of employment, and the type of skills and knowledge that could be required to support the project. • Employment barriers to participation for local under-represented groups; and • Details on any commitments to maximize positive socio-economic outcomes for local communities, as well as the provision of a detailed hiring strategy. 	
ESDC-02	Section 19.3 – Socio-Economic Impacts	Employment and Economy	All project components that require hiring of workforce	<ul style="list-style-type: none"> • The Proponent's initial valuation is that there are no negative socio-economic effects that will occur as a result of the project, including on: <ul style="list-style-type: none"> ○ Neighbourhood or community character ○ Local businesses, institutions or public facilities ○ Economic base of municipality or communities; ○ Local employment and labour; • While the employment impacts of the project would be highly positive overall, there may be some negative impacts as well. The Proponent has not clearly demonstrated how any adverse effects to employment would be managed or mitigated. 	<ul style="list-style-type: none"> • Please refer to the response in comment ESDC-01 	3	<p>ESDC has a series of guidance materials for the Proponent to find and hire. Furthermore, assistance on training and skills development for employees and underrepresented groups can be provided through a suite of programs. Related information can be found in the following links:</p> <ul style="list-style-type: none"> • https://www.jobbank.gc.ca/hiring/resources/train-employees 	

				<ul style="list-style-type: none"> • For example, the demolition and construction of the bridge may affect nearby businesses, both by making it harder for potential customers to reach them and by making the neighborhood noisier and less pleasant, reducing its attractiveness to potential customers. It is also possible that the hiring of workers for this project would lead to labor shortages elsewhere. • Some of the ESDC programming could be helpful to mitigate adverse effects to employment. Suggestions of ESDC programs are provided in the 'Instructions' column. 			<ul style="list-style-type: none"> • Sectoral Workforce Solutions Program • https://www.canada.ca/en/employment-social-development/services/funding.html • https://www.tbs-sct.gc.ca/ems-sgd/edb-bdd/index-eng.html#orgs/dept/128/infograph/related • Description of the Indigenous Skills and Employment Training (ISET) Program – Canada.ca • Skills and Partnership Fund-Canada.ca <p>To the extent that the Proponent re-evaluates potential effects, it is strongly recommended to re-evaluate their mitigation measures to employment issues that are known to be standard mitigation.</p> <p>For example, if the Proponent finds that particular demographic groups are systematically under-represented in the industry workforce, it would be strongly recommended that the Proponent have a mitigation strategy in place to affect local workforce representation.</p>
ESDC-03	Section 19.3 – Socio-Economic Impacts	Employment and Economy	All project components that require hiring of workforce	<ul style="list-style-type: none"> • The Proponent has not adequately applied a gender-based analysis plus (GBA+) lens in considering the effects to employment (e.g. consideration of underrepresented groups). • Gender-based analysis plus (GBA+) is an analytical framework that guides Impact Assessment practitioners, proponents, and participants on how to describe the full scope of potential positive and negative effects under the Impact Assessment Act. • This could be managed by adhering to established and public policy guidance on Gender-based Analysis Plus in Impact Assessment. • So few women are employed in construction that there is a high risk few would be employed on this project if efforts are not made to include them. 	<ul style="list-style-type: none"> • Please refer to the response in comment ESDC-01 	3	<p>It is strongly recommended that the Proponent follow the Impact Assessment Agency of Canada's policy guidance on Gender-based Analysis Plus in Impact Assessment throughout the process. Note that application of the GBA+ methodology is formally required through the Impact Assessment Act (2019) under paragraph 22(1)(s).</p> <p>It is recommended that the Proponent engage with the Sectoral Workforce Solutions Program, as</p>

							<p>applicable to their Project. The SWSP is a contributions program that funds sectoral projects that support workers and employers through a wide range of activities:</p> <ul style="list-style-type: none"> • Training and reskilling to help workers gain new skills to meet the needs of employers and transition to in demand jobs in key sectors; • Helping employers, in particular small and medium sized businesses, attract and retain a skilled and innovative workforce; • Initiatives to help equity-deserving groups get the skills they need to find work and succeed in key sectors; • Other creative solutions, standards and tools to address sectoral labour market needs. 	
ESDC-04	Section 19.3 – Socio-Economic Impacts	Employment and Economy	All project components that require hiring of workforce	<ul style="list-style-type: none"> • The Proponent has not adequately articulated the intent to support diversity and inclusion through their hiring and training strategies. • A hiring strategy and efforts to promote an inclusive labour market should be included, and would serve as a mitigation to the potential issue of under-representation of certain groups in the project’s workforce. • It is assumed that since workers will be coming from the local area, no additional community services will be required to support the project workforce. Linked to earlier comments about a lack of a strategy for workforce diversity on the project, there is no assessment of whether there are sufficient early learning and child care services to support women’s employment on the project. • Additional information is required about the availability and cost of regulated early learning and child care services within the project community in order to support women’s employment on the project. 	<ul style="list-style-type: none"> • Please refer to the response in comment ESDC-01 	3	<ul style="list-style-type: none"> • The project description should include information on whether diversity and inclusion will be supported through strategies for training, hiring, procurement and contracting. • The project description should include information on whether any consideration is being given to facilitating training for potential candidates to ensure they have the necessary skills. • The project description should specify whether any consideration is being given in relation to access to training programs for other underrepresented groups (women, youth, person with disabilities) as well as access to other supports that could facilitate their 	

							participation in training. For commentary specific to Indigenous persons, please refer to comment ESDC-05.	
ESDC-05	Section 19.3 – Socio-Economic Impacts; Section 4.4- Financial Support for Indigenous Engagement- Section 19- Potential Impacts on Economic Conditions of Indigenous Peoples	Employment and Economy	All project components that require hiring of workforce	<p>The Proponent articulated that there would be no negative effect on Indigenous Peoples with respect to employment and business opportunities. However, more detail is needed to adequately assess the economic benefits.</p> <p>More information to support this analysis is required, including more details on ongoing engagement and outreach activities including potential communities that can be engaged; types of economic opportunities (related to Indigenous businesses and communities); and direct positive economic impacts.</p>	<ul style="list-style-type: none"> Please refer to the response in comment ESDC-01 	3	<ul style="list-style-type: none"> The project description should include information on whether any consideration is being given to facilitating training for potential candidates to ensure they have the necessary skills. It is recommended that the Proponent explicitly identify whether Indigenous individuals and businesses will receive prioritized employment opportunities. It is recommended that the Proponent engage with the Indigenous Skills and Employment Training (ISET) service delivery providers throughout the project. In Ontario, there are currently 22 Indigenous service delivery organizations and in Quebec there are currently 7. There could be a potential partnership between one or more of the existing Indigenous service delivery organizations related to the project activities to support local labour force participation related to the project. <p>Link: https://www.canada.ca/en/employment-social-development/programs/indigenous-skills-employment-training/service-delivery-organizations.html</p> <p>More specifically, the following ISET service delivery organizations are located in the vicinity of the project:</p> <ul style="list-style-type: none"> Akwesasne Career & Employment Support Services Aboriginal Labour Force Development Circle Tungasuvvingat Inuit Metis Nation of Ontario 	

							<ul style="list-style-type: none"> Ontario Federation of Indigenous Friendship Centres Urban/Unaffiliated: AFNQL Assembly of First Nations Quebec-Labrador (apnql.com) <p>In addition, complimentary to the ISET Program, the Skills and Partnership Fund (SPF) a project-based program that funds partnerships between Indigenous organizations and industry employers to provide skills training for Indigenous peoples linked to economic opportunities at the local, regional and national level. By increasing access to training that is demand-driven, the SPF plays a key role in directly linking Indigenous peoples to specific jobs and improving their employment outcomes.</p> <p>There may be potential opportunities under the current round of SPF investments starting in 2022-2023 to leverage training opportunities in partnership with Indigenous communities and other partners. A call for proposals was launched on February 28, 2022, and is closing on May 9, 2022.</p>	
ESDC-06	Section 15.2 – Economic Context; 15.2.1.1.2 Operation and Maintenance – Pg. 186; paragraph under Table 15-6	Employment; Community Services and Infrastructure	All project components that require hiring of workforce	<ul style="list-style-type: none"> The Proponent provides a summary of the Alexandra Bridge Replacement Project and its potential impacts on Canadians and Indigenous communities – notes on pg. 186 that the project will “generate 6,589 jobs in Ottawa and Gatineau and Canada” over the course of its duration from 2028-2032 Proponent does not provide details on how these positions will be filled if Canadians are not available. 	The Proponent would need to make reasonable efforts to hire Canadians/Permanent Residents and also demonstrate how the hiring of the TFWs would have an overall positive effect on the Canadian labour market	3	<ul style="list-style-type: none"> The Proponent should provide a more detailed account of their human resource strategy. 	
ESDC-07	19.3 – Social and Economic Impacts	Employment and Economy	All project components that	<ul style="list-style-type: none"> is important to note and take into consideration that Service Canada Centre (SCC), including passport services, is located near the Alexandra Bridge in Quebec (less than 200 m away) 	<ul style="list-style-type: none"> Please refer to ESDC-01 	3	<ul style="list-style-type: none"> The project must take into account the in-person service offered by 	

			require hiring of workforce	<ul style="list-style-type: none"> On the other hand, the two SCCs in the Ottawa area are located more than 10 km from the bridge, at the east and west ends of the city. Consequently, the Gatineau-Hull office represents the closest point of access for a large proportion of Ottawans, particularly those living in the downtown area. Service Canada Programs Branch programs fund training and employability development for Aboriginal people. The communities targeted in this project all receive funding from the Aboriginal Skills and Employment Training Program (ASEP). The funding is used to prepare and support Aboriginal community members to access the labour market, taking into consideration the community's priorities or projects. The communities that will participate in this project will therefore have the necessary time to prepare their members to acquire the necessary skills to participate in the construction of the bridge, which will not begin until 2028. Barriers to employment that have been identified include the availability of child care. The Aboriginal Early Learning and Child Care (ALCCC) program funds child care in communities. 			<p>government institutions and be aware of the impacts in order to ensure the implementation of alternative measures in the short term, if necessary.</p> <ul style="list-style-type: none"> During the construction period for example, it could represent a particular challenge for Ottawa's clientele since they will have to use the other bridges, which are further away from the Gatineau-Hull CSC. However, once the replacement is completed, the presence of a dedicated transit lane on the new bridge will make it even easier for Ottawa clients to access government services offered by Service Canada (including Passport services). It is recommended that the ASEP and AGJEA be included as programs to fund training and employability for Aboriginal people. 	
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Table 2: General and editorial comments - include comments such as formatting, layout or grammar

Comment ID	Document Reference	Context and Background	Instructions to Proponent
Example: TC-01	Example: Initial Project Description Part D, section 17 Pg. 11	Example: The Proponent has identified the Navigation Protection Act under the list of federal powers, duties, or function; however, the section appears to be consistent with changes to the legislation introduced in 2019.	Example: In 2019, the Navigation Protection Act was amended and renamed the Canadian Navigable Waters Act please ensure that the correct title is used.
ESDC-08	Section 10 and 17	This bridge that will cross the Ontario/Quebec provincial border will fall under federal jurisdiction. The jurisdiction of the workers who will construct the bridge is not yet known and will be determined once the contract is awarded. However, it is likely that the workers will be under provincial jurisdiction and PSPC would have obligations under the <i>Canada Labour Code</i> , Part II for persons granted access.	When it comes time to award the contract for the construction of the bridge, it should include provisions for the employer to demonstrate that they will meet the applicable provincial / federal Occupational Health and Safety legislative requirements (Building Code, Fire Code, Electrical Codes, Canada Labour Code, Part II, Provincial OHS Code, etc.).
ESDC-09	Section 15.1.1 Potential Impacts	<ul style="list-style-type: none"> It is hard to measure the impact as traffic patterns have changed immensely in Ottawa/national capital region due to the pandemic. From the perspective of impact on ESDC services, while it is noted that the Alexandra Bridge is not in close proximity to the Ontario Region Service Canada Centres, if the traffic patterns return to pre-pandemic volumes, there may be greater impacts on commutes to offices depending on where a client is commuting from. However, the Gatineau Passport office can be accessed through another bridge. 	We note that alternatives routes and “measures for traffic control will be planned in conjunction”

		<ul style="list-style-type: none">• Constructing the new bridge while the current bridge is still in use would mitigate many of the traffic related concerns.	

Please insert additional rows as necessary.