

Enclosure 1: Federal Authority Advice Record: Authority and Summary of Issues

Project: Alexandra Bridge Replacement Project
Proponent: Public Services and Procurement Canada and National Capital Commission
CIAR No.: 83444

Part A - Summary of Issues, Permitting Plan and Tailored Impact Statement Guidelines
Response due by: April 18, 2022

All comments should be submitted via the **Submit a Comment** feature available on the Project’s Canadian Impact Assessment Registry page (Reference 83444 at <http://iaac-aeic.gc.ca/050/evaluations/proj/83444?culture=en-CA>). Letters and forms can be uploaded using this feature. If you have any difficulties submitting this way, please contact the Agency at Alexandra@iaac-aeic.gc.ca for assistance.

Department/Agency: Women and Gender Equality Canada	
<i>Primary Contact Details:</i>	
Contact Name: Denise Gareau	Telephone: 419-729-6969
Address: 22 Eddy St., Gatineau QC	Fax:
Email: CFC.EvaluationImpacts-ImpactsAssessment.SWC@cfc-swc.gc.ca	
<i>Alternate Contact Details (if applicable):</i>	
Contact Name: Jessica Bialek	Telephone:
Address: 22 Eddy St., Gatineau QC	Fax:
Email: Jessica.Bialek@fegc-wage.gc.ca	

1. Identify and describe the specialist or expert information or knowledge within your department or agency that would be relevant to the conduct of the impact assessment of the Project, should a federal impact assessment be required.

The mandate of Women and Gender Equality Canada (WAGE) is to advance equality with respect to sex, sexual orientation, and gender identity or expression through the inclusion of people of all genders, including women, in Canada’s economic, social, and political life. In addition to gender equality, WAGE is the Government of Canada lead on GBA Plus, which is an analytical tool to support the development of responsive and inclusive initiatives, including policies, programs, and other initiatives. GBA Plus is a process for understanding who is impacted by the issue being addressed by the initiative; identifying how the initiative could be tailored to meet diverse needs of the people most impacted; and anticipating and mitigating any barriers to accessing or benefitting from the initiative.

Application of GBA Plus within the Impact Assessment process helps unpack, contextualize, and address inequalities that are based on identity and other factors and their intersections. Factors include but are not limited to race, national and ethnic origin, Indigenous origin or identity, age, sexual orientation, socio-economic condition, place of residence and disability.

Based on the project’s potential effects relating to women and the advancement of gender equality, the following are potential effects within federal jurisdiction on which WAGE focus:

- Section 2 of the Impact Assessment Act:
 - (c) With respect to the Indigenous people of Canada, an impact on: (i) physical and cultural heritage
 - (d) Any change occurring in Canada to the health, social or economic conditions of the Indigenous peoples of Canada
 - (e) Any change to a health, social or economic matter that is within the legislative authority of Parliament that is set out in Schedule 3.

2. The proponent has indicated in the Initial Project Description (Section 17.1, Table 17-1) that approvals under the following federal legislation may be required for the Project to proceed:
 - Fisheries Act
 - Canadian Navigable Waters Act
 - Species at Risk Act
 - Migratory Birds Convention Act
 - National Capital Act

(a) Validate whether the information relating to your department or agency’s powers, duties, or functions contained in the Initial Project Description is accurate.

List the potential powers, duties, or functions, including federal funding, that your department or agency may issue to enable the Project to proceed. For each, please explain why your department or agency may issue the potential power, duty, or function, and, if applicable, the level of oversight, if any, that the regulatory instrument provides with respect to valued components that are relevant to your mandate.

WAGE does not hold any regulatory power, functions or duties.

(b) Has your department or agency already exercised any of the above-noted power or performed a duty or function to enable the proposed Project to proceed in whole or in part? Yes No

If yes, please list and describe each.

N/A

(c) Please include a description of consultation activities that would occur with Indigenous groups if your department or agency has to exercise a power or perform a duty or function related to the Project, and how potential impacts to Indigenous groups are addressed by your department or agency. Indicate the potential timeline for Indigenous participation, in relation to each applicable authorization, in support of Agency's development of the Permitting Plan and the Indigenous Engagement and Partnership Plan

N/A

(d) Please include a description of opportunities for public participation if your department or agency has to exercise a power, or perform a duty or function related to the Project. Indicate the potential timeline for that participation, in relation to each applicable authorization, in support of the Agency's development of the Permitting Plan and the Public Participation Plan.

N/A

3. (a) **Using Table 1 of Enclosure 3**, indicate whether the description of potential effects presented in the Initial Project Description sufficiently characterizes potential project effects— including direct and incidental effects, and effects within federal jurisdiction—as related to your mandate . Provide advice on whether these effects may be adverse and whether your regulatory instruments, operational guidance to proponents or other standard practices could be used to address these effects. *Note: Information on effects and direct and incidental effects as well as effects within federal jurisdiction are defined in section 2 of IAA.*¹

(b) **Using Table 1 of Enclosure 3**, identify any additional potential adverse effects of the Project that are not described in the Initial Project Description and their linkage to effects, effects within federal jurisdiction, and direct and incidental effects. For each, provide advice on whether your regulatory instruments, operational guidance to proponents or other standard practices could be used to address these effects.

Name of Responder

Signature

Title of Responder

Date

¹ A link to *Impact Assessment Act* text can be found here: <https://www.canada.ca/en/impact-assessment-agency/corporate/acts-regulations/legislation-regulations.html>

Introduction

The Alexandra Bridge is one of only five interprovincial bridges open to vehicular traffic in the National Capital Region (NCR) linking the cities of Ottawa, Ontario and Gatineau, Quebec. The Alexandra Bridge is in an advanced state of deterioration and has several significant structural concerns which have resulted in the current reduced level of service and several mitigation measures implemented by Public Services and Procurement Canada (PSPC). At this time, the mitigation measures, and reduced level of service are precautions considered appropriate for the Alexandra Bridge to remain safe and in service until its replacement.

Due to the factors listed above and as part of a larger effort to improve interprovincial transportation in the NCR, PSPC and the National Capital Commission (NCC) have been directed by the federal government as part of Budget 2019 (GoC, 2019) to develop a holistic strategy to ensure that the five (5) interprovincial crossings in the NCR remain safe and open for use by residents and visitors. This strategy includes pre-planning for the replacement of the Alexandra Bridge. The Project comprises of the deconstruction and reconstruction of the bridge, with construction anticipated to start in 2028 through 2032.

Given that the Project is located within the NCR, it is also subject to Federal Approval by NCC under the National Capital Act. In this region, work by federal departments, works on federal lands as well as the sale and/or transfer of federal lands are subject to the NCC's approval. The NCC evaluates applications based on the conformity with relevant legislation (including the Impact Assessment Act, 2019), federal plans, policies, public and stakeholder feedback, and discussions with Indigenous groups, as well as applicable design guidelines. To date a federal approval has been granted for the Project's Planning and Design Principles (June 2021; available on the NCC's webpage). The Federal Land Use, Design and Transaction Approval (FLUDTA) process will include multiple rounds of review and approval, corresponding to the various stages of planning as well as design and construction of the Project. All stages of the Alexandra Bridge Replacement Project will be classed as Level 3 Projects, the highest-level classification for Federal Approvals.

Level 3 Projects are subject to a comprehensive land use and design review, with input from the NCC's Advisory Committee on Planning Design and Realty (ACPDR), as part of the federal approval process. Authorizations from other federal and provincial regulators will also be required for the Project. Mitigation strategies, including monitoring their implementation and effectiveness, will seek to achieve no significant negative long-term impacts from the Project. Indigenous Partners and the public were engaged early to identify values, issues, and concerns, as they relate to the Project. Engagement with Partners and stakeholders will continue for the life of the Project. Their input will inform key elements that will contribute to the Project's planning, design and construction.

Moving forward, the NCC will allow participants to self-identify and continue to offer diverse approaches to facilitate participation in public consultation. Future consultations could include virtual town halls, surveys, and face-to-face consultation, if suitable. Efforts to ensure that all consultation is inclusive and considers diverse perspectives as part of the Project's public engagement process will be ongoing.

Overview of Gender-based Analysis Plus (GBA Plus)

GBA Plus is an analytical tool to support the development of responsive and inclusive initiatives, including policies, programs, and other initiatives. GBA Plus is a process for understanding who is impacted by the issue being addressed by the initiative; identifying how the initiative could be tailored to meet diverse needs of the people most impacted; and anticipating and mitigating any barriers to accessing or benefiting from the initiative. GBA Plus is also an ongoing process that does not stop once an initiative has been developed. GBA Plus is an analytical tool that can be applied to all stages of initiative development, implementation, monitoring, and evaluation. Applying GBA Plus early in the policy development process ensures that diversity considerations are embedded in the decision-making process, allowing for responsive and inclusive initiatives that meet the needs of diverse groups of people.

GBA Plus also involves consideration of the context within which people live, including systems and structures of power. When we consider how these factors work together, we recognize that there are as many differences within groups of people as there are between groups. This recognition is important for doing GBA Plus well and thoroughly.

Some key questions to consider as data and information are gathered at all stages of GBA Plus include, but are not limited to:

- What disaggregated data is available to understand the various intersecting dimensions of the issue?
- Am I prioritizing certain factors and/or data over others? If so why?
- Who should be involved in gathering and analysing data?
- How does age, culture, disability, education, ethnicity, geography, gender, economic status, language, race, religion, sex, and sexual orientation shape who is impacted by this issue? How do these factors change the nature and extent of the impacts?
- How might I engage those who are affected by this issue in my analysis and in the development, implementation and monitoring of the initiative including those who are not traditionally represented?
- Are there any gaps in data in identifying differences and inequalities?

Additional information on GBA Plus and diversity analysis is available at the following:

- <https://research-groups.usask.ca/reed/documents/CEAA%20Report.FINAL.%20Walker%20Reed%20Thiessen.%20Gender%20Diversity%20in%20IA.Feb%2008%202019.pdf>
- <https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/gender-based-analysis.html#toc9>

Documenting the context – Creating a baseline

If an Impact Statement is required, there would be a need to document baseline information about the community potentially impacted by the project. This would include basic data and gender analysis as it related to the social, economic and health impacts, such as gender and poverty, division of labour, the differential situation of women and men vis-à-vis indicators (such as literacy, land access, participation in fishing/ agriculture, political participation, etc.). This information should bring to the surface gender and other differences and disparities related to a core problem or issue demonstrating that some groups face different, distinct or greater barriers and risks than others. The analysis should move beyond the descriptive (e.g., percentage of low-income people) to ask critical questions about norms, roles and relations and how that influences power relations (e.g., who has what, who does what, etc.) in a particular context. It should also demonstrate linkages between the economic and legal environment where norms and rules in organizations or in other societal structures become obstacles for certain groups (e.g., historical and contextual issues that have limited access to opportunities).

Disaggregated data

Detailed overview of the target population group(s) and local context will be necessary in the Impact Statement. This will allow to clearly identify the segments of the population that will either benefit or be negatively impacted by the project. Information should be updated and disaggregated at minimum by sex, gender, age, and ethnicity. Where possible, data should be further disaggregated to include information such as on the impact to diverse groups within the project's area of influence, such as Indigenous peoples, women, low income, under or unemployed, disabled, seniors and systematically marginalized groups. Disaggregated baseline information will be essential in the Impact Statement to demonstrate changes over the life of the project and to provide a reference point for assessing gender equality results. Extracting this data normally involves consulting a range of sources, such as government statistics, administrative reports, or previous studies. If data gaps exist, this should be mentioned up front in the Impact Statement and additional steps should be taken to fill gaps in information. For instance, while there is a rise in census participation from Indigenous communities, the information may not always be available or shared.

The quantitative information, including gender sensitive data, should also be complemented by qualitative insights from studies or consultations and from various sources. For example, the Impact Statement should provide a detailed profile of the socio-economic conditions of the households and communities that may be affected by the project.

Public Engagement and decision-making

Consultation with various groups and individuals, including residents and Indigenous groups, are an important element of the GBA Plus process. The initial project description discussed engagement activities to date, however further detail is required on the participants in the engagement plan to ensure transparent and inclusive processes. Companies often fail to adequately consult with women or diverse groups when negotiating access to land, compensation or benefit-sharing agreements. In addition, language and information materials should be accessible to all. If not adequately consulted, this can disempower and disadvantage individuals as groups, and many also undermine traditional decision-making structures. Communities also have different social, economic, and political conditions and cultural specificities that combine in different ways to enable or constrain women's agency and leadership. It is important to understand decision making processes and abilities of individuals or groups in the local area – not only who, but also different kinds of decisions people make, particularly related to the use of resources.

Ultimately, the Impact Statement should allow for a better understanding of people's decision-making abilities about development in the community, particularly on the use of resources. An Impact Statement can provide information on how the project intends to support culturally sensitive participation of women and diverse groups in decision making.

Social needs and well-being

The Impact Statement should also include information on what was heard through the engagement or consultation process on social needs and well-being. Including diverse perspectives in engagement and consultation processes supports the identification of different needs, particularly as it relates to social needs such as health or social services. For example, when barriers are identified to women's participation such as lack of childcare services, measures can be considered to provide childcare services or creating child-friendly spaces during meetings. Similarly, there are cases where men gain employment in industrial projects and withdraw their labour from traditional subsistence activities such as hunting, fishing, gathering and/or trapping, which can create – and exacerbate existing – gender inequalities in the communities. The Impact Statement will also need to demonstrate how engaging community members helps ensure the specific needs of men, women and gender diverse groups of people are understood and adverse impacts are mitigated, or positive impacts enhanced.

Access and control over resources

Access and control over resources is concerned with both the availability of resources, and the benefits that come from the use of these resources. The project proponent may wish to include information in the Impact Statement on how access and use of resources, such as education, information and services will be impacted by the implementation of the proposed project. The Impact Statement should elaborate on how the proponent plans to implement local employment and policies and planning, while using local skills and supporting local initiatives.

For the project to be sustainable and inclusive, the Impact Statement should identify resources in the community, and then describe who accesses these resources. For example, if traditional livelihoods are affected and women are unable to access employment due to skill shortages, the project can consider ways to support women's employment in the industry or hire business owned by local and/or Indigenous women in the supply chain.

In addition, to understand the constraints and barriers faced by certain individuals or groups in access to and use of resources, the Impact Statement should describe the social norms and broader social power structures, such as legal frameworks that can impact women, men and diverse groups of people's ability to equally benefit from the opportunities in this industry.

Economic opportunities

Economic opportunities and access to the financial benefits of projects is often limited for women and for a range of diverse groups. Moreover, the Impact Statement should describe whether the project will generate significant benefits and opportunities for local communities, such as who from the communities will benefit and the potential for diverse labour force and considerations, including women's employment or entrepreneurship opportunities in the sector. It should also outline employment rates in the area and describe the level of nature of unemployment in the local area (e.g., people with low levels of educational attainment).

As the project proponent develops the Impact Statement, information should be included on how women and men and diverse groups of people are employed either as wage earners in the labour market or in customary livelihood occupations. This is particularly relevant for Indigenous communities where "pluri-activity" often characterizes household incomes. The proponent may wish to include information on what potential it has for increasing employment for women and other under-represented groups in the sector and for local workers more generally. The proponent may wish to identify measures that will be undertaken to support the recruitment, development, and retention of those workers. Information on the training opportunities that will be made available for the prospective workers may also be of relevance. This could include collaboration with local learning institutions to deliver training targeted to these populations. Measures related to the supply chain may also be considered for example, the creation of incentives or criteria that favour local suppliers. Additional detail on how the project can have positive implications on the local economy more broadly should be included (e.g., supplying food, accommodations or potentially as it related to purchasing construction materials). The proponent may also wish to describe in the Impact Statement its own workforce development plans as they related to diversity and inclusion.

Gender-Based Violence (GBV)

In certain cases, projects can generate and result in increasing migration and influx of transient workers. In most cases, men remain over-represented in the resource development and infrastructure sector. The Impact Statement should identify and assess the potential issues of gender-based violence (e.g., sexual harassment, violence against women, human trafficking). The Impact Statement will need to explore these potential issues and increased risks such as GBV, which can make women feel less safe in their homes and communities. The Impact Statement will need to identify the specific groups among women (e.g., Indigenous, younger women, youth), that are often disproportionately affected by these health and safety risks, including intimidation and discrimination. Risks and negative impacts can also be experienced by groups that are not specifically targeted by the project.

GBV is a persistent problem in all societies and should be explored in the assessment, for example, to ensure that the proponent and worksite contractors take measures to prevent sexual harassment and violence. The Impact Statement should include an overview of the legal framework, such as relevant labour laws and policies related to GBV. For example, Canada's laws governing domestic violence and the jurisdictions to address the problems differ from province to province. The Impact Statement should also consider mitigation measures, where relevant, such as programs to support the safety and security of people, including codes of conduct and programs to engage men as change agents – arguably one of the most challenging aspects of promoting gender equality. If temporary infrastructure is required, such infrastructure should include washroom facilities that are safe spaces for all workers. Should it be relevant, the proponent should include in the Impact Statement background information on GBV in the impacted communities and how project interventions may have unintended impact or increased risk in the development of the project.

Conclusion

While GBA Plus should be embedded throughout the Impact Statement and Impact Assessment, a specific section that summarizes key issues and identifies mitigating measures to address these issues can be useful as it helps form the basis for a GBA Plus implementation framework. It is recommended that key issues and practical measures be prioritized, rather than devising an exhaustive list that might not be realistic to implement. Underpinning these key actions with indicators of success and monitoring progress regularly also helps institutionalize gender equality and inclusion in the project management.