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). Response due by: April 18, 2022.

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

Please identify comments by organization and comment number.	If the comment is related to a specific section of the documentation, please provide a reference (e.g. title, section, subheading, page number).
	
	You may also choose to copy the relevant text here.
		Identify the valued component(s)—within the mandate of your department, ministry or agency—to which the effect applies.
		
		This may include components of the environment, health, social or economic conditions.
			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:
				
				• Describe whether the Proponent has adequately articulated the **effect**. Provide rationale. If an effect that could affect a valued component is not described adequately, explain what is lacking or unclear and describe any possible link between the effect and a project activity or component.
				• Describe whether the Proponent has identified and adequately articulated **mitigation and/or monitoring measures** to address the potential effect. Provide rationale.
				  a. If the Proponent has identified mitigation measures, provide your expert opinion of the proposed measures; indicate whether these mitigation measures are well understood and of proven effectiveness.
				  b. If not, provide advice on how the effect could be managed through well-understood mitigation measures, and identify such measures.
				• 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:
					
					• Identify the act and associated power, duty or function.
					• Indicate whether the exercise of the associated power, duty or function would mitigate, manage or set conditions that would address the effect.
					• Indicate whether the exercise of the associated power, duty or function would involve public and Indigenous consultation.
					• Where appropriate, reference any standard guidance or industry requirements that the proponent may need to follow to manage effects that fall within your mandate.
						Based on the information that you have provided, please 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 applicable, provide instructions for how the Proponent would build confidence in the Detailed Project Description and Response to the Summary of Issues to support or confirm the risk rating selected at left.
								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. Please, where possible, use simple (lay) language in your summary.

[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.

					• Does your department, ministry or agency have any established or emerging policies or directives that are relevant to the Project? Is the Project compatible or incompatible with the relevant policies or directives?			
WAGE-01	Engagement with Indigenous partners (p. 27)	Social	N/A	While the Proponent provides an overview of engagement with various Indigenous communities and organizations, it is unclear if additional efforts will be made to engage with other Indigenous community members (e.g., Indigenous social organizations) including, but not limited to Chief and Council and other formal administrative bodies to support the collection of information needed to achieve GBA Plus objectives. As state in the Guidance Document: GBA Plus in Impact Assessment, we know that projects do not impact all people in the same way. Canadian research demonstrates that designated projects impact women, Indigenous peoples and other historically excluded groups in unequal ways (Goldenberg et al., 2010; Nightingale, Tester and Aaruaq 2017; Cox & Mills, 2015; Windsor & McVey, 2005; O'Faircheallaigh, 2013). For example, research has highlighted the links between resource development projects and risks of gender-based violence and sexual harassment for Indigenous, Métis and Inuit women in Canada (Amnesty International, 2016; National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019; Pauktuutit Inuit Women of Canada, 2021). It is, therefore, standard practice in impact assessment to consider a project's effects on groups that are historically excluded or more exposed to a project's adverse effects. This can include populations close to the project site, young or elderly populations, or employees of the project. GBA Plus can help engage communities in identifying and interpreting impacts and collaboratively developing mitigation measures.	N/A	2	WAGE recommends considering future consultations with Indigenous organizations to ensure all areas of concerns or interest are identified within potential affected Indigenous populations. This approach must take into consideration an intersectional lens including gender and age, at a minimum (women, children, (dis)abled, etc.). Suggest using same approach for Indigenous engagement, which the proponent proposed in the plans for public engagement (Table 3, page 26).	Potential oversight of possible social/human health considerations (e.g., Gender-base Violence risks during deconstruction and construction stages to workforce and various population).
WAGE-02	Economic Benefits – Indigenous	Social	N/A	Through the Labour Force in NCR section, disaggregated data by gender is included to better understand the socio-economic situation within the NCR and gaps withing certain	WAGE holds expertise in issues related to gender equality, the application	2	WAGE recommends that the Proponent to consider appropriate mitigation	Recommendation is to ensure that through this

	Participation Plans (p. 34-35) Labour Force in the NCR (p. 89-91)			industrial sectors. Considering this data and Indigenous consultation areas of Concern or Interest, what are the mitigation options for filling gender and Indigenous participation gaps?	of GBA Plus/ Intersectional analysis and information related to Gender-based violence. Intersectional analysis of GBA Plus incorporates considerations related to economic context and potential impacts on diverse groups, and mitigation measures to address differential impacts, or enhance positive impacts.		measures for any differential impacts that may occur as a result on the project as they may perpetuate inequalities between different groups of population. For example, are there specific initiatives for the hiring and retention of a diverse workforce? Especially, for women, gender diverse individuals, ethnic minorities, etc. who are underrepresented in the construction sector?	Project, various workers groups can benefit from this Project.
WAGE-03	Human Health Context (p. 93)	Social	N/A	WAGE recognize that extensive studies and assessment are underway. Therefore, would highlight the need to conduct such studies on potential impacts on human health, socio-economic condition and environmental by diverse groups of population (by disaggregated population: women, Indigenous population, youth; and within an intersectionality lens: Indigenous women; young men)	WAGE has a mandate to lead the implementation of GBA Plus across the federal government and provide expert advice and strategic support to federal departments and agencies in the development of policies, programs and legislation related to gender equality. Intersectional analysis of GBA Plus incorporates considerations related to health, social and economic impacts, which includes engagement with diverse groups and subgroups, and mitigation measures to address differential impacts, or enhance positive impacts.	2	WAGE recommends that a GBA Plus is applied to the Human Health Context of the IPD. Health of diverse groups of population, their socio-economic condition and environmental effects will be impacted by the Project differently.	Recommendation is to ensure future studies consider potential effects on various population groups by applying an intersectional lens.
WAGE-04	Gender-based Violence (GBV)(p. 96)	Social	N/A	As state in the Guidance Document: GBA Plus in Impact Assessment, we know that projects do not impact all people in the same way. Canadian research demonstrates that designated projects impact women, Indigenous peoples and other historically excluded groups in unequal ways (Goldenberg et al., 2010; Nightingale, Tester and Aaruaq	WAGE has a mandate to provide expert advice and strategic support to federal departments and agencies in the development of policies,	2	WAGE recommends that the analysis of GBV risk also includes potential risk for the workforce and general population during all phases of this Project	Recommendation is to ensure that potential mitigation measures be in place to address all GBV risks.

				2017; Cox & Mills, 2015; Windsor & McVey, 2005; O'Faircheallaigh, 2013). For example, research has highlighted the links between resource development projects and risks of gender-based violence and sexual harassment for Indigenous, Métis and Inuit women in Canada (Amnesty International, 2016; National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019; Pauktuutit Inuit Women of Canada, 2021). WAGE is satisfied with the inclusion of Gender-based Violence (GBV) considerations on individual safety when crossing and using the bridge. WAGE would also recommend that potential GBV concerns be considered during the deconstruction and construction stages for both workforce population and general population (within a disaggregated and intersectional perspective)	programs and legislation related to gender equality, including gaps in health research and care.			

Please insert additional rows as necessary.

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.*

Please insert additional rows as necessary.