

Women and Gender Equality Canada Comments on:
(BC) Spanish Mountain Gold Mine Project
IPD (version March 15, 2022)

(for improving intersectional GBA Plus approach)

Note: WAGE recommends using the term “GBA Plus” instead of “GBA+”. The Plus is no longer a symbol, rather spelled out to emphasize the intersectional approach of GBA Plus.

Comment Organization	Document Section/Page #	Participant Issues, Description or Comment
WAGE-01	Initial project Description Summary Potential Project Interactions / Table S3 Preliminary identification of potential project interactions (page xix)	<p>WAGE has some concerns related to the lack of information in the preliminary identification on potential project interactions. Currently it does not include potential health, social and economic components based on Project-social interactions (FYI: Canadian research/evidence 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.</p> <p>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 impacted to a project’s adverse effects. This can include populations close to the project site, young or elderly populations, or employees of the project. (Source: IAAC’s GBA Plus Guidance)</p> <p>WAGE recommends that the Proponent consider how different populations within the participating Indigenous Nations (women, children, (dis)abled, etc.) might be affected by the Project-social interactions.</p>
WAGE-02	Initial project Description Summary Potential Project Interactions / Table S3	WAGE recommends adding social impacts, as transient, male-dominated workforces can have adverse social impacts in communities, particularly for young and Indigenous women. The interrelationships between sexism, racism and colonialism

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	Preliminary identification of potential project interactions (page xxii)	<p>shape these impacts (National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019)</p> <p>Potential mitigation measures could include: Robust workplace education and sensitivity training, as well as strict enforcement of harassment, alcohol and drug policies, may be required. Enforcement must include real consequences for harassing or violent behaviour. (Source: IAAC's GBA Plus Guidance).</p>
WAGE-04	8.0 Indigenous Nation and Public Interests (page 37-52)	<p>Preliminary identification of potential project interactions did not include potential health, social and economic components based on Project-social interactions. Therefor, WAGE recommends reviewing “who is at the table and who is missing?”. Asking critical questions about who is represented can also expose existing power inequities that limit participation by some individuals or groups.</p> <ul style="list-style-type: none"> • For example, practitioners may require separate consultation sessions for some community members to create a safe space where they can raise their concerns. The <i>Impact Assessment Act</i> emphasizes early, meaningful engagement and broad-based consultation. • While not only relevant to the GBA Plus aspects of the legislation, the participation of diverse and historically marginalized groups, is an important part of the process. Participatory assessments have the potential to influence all elements of a proposal by informing and influencing activities, providing opportunities for feedback in the design and implementation of the project. These influences will be stronger and more sustainable if the process includes ongoing participatory monitoring and evaluation. For more information, see our guidance on public participation. <p>In addition, GBA Plus prompts practitioners to challenge assumptions by asking why a particular disparity exists. This is especially relevant to impact assessment because the "why" allows proponents, federal authorities and individuals to identify evidence-based, targeted and appropriate mitigation measures. For example, an impact assessment may identify that there are few women working at similar projects in the area. Asking "why" in this case may identify structural barriers like:</p> <ul style="list-style-type: none"> ▪ lack of skill development or educational opportunities for women;

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		<ul style="list-style-type: none"> ▪ a limited awareness among project proponents of the benefits of employment diversity; ▪ systemic sexism and racism in the workplace; ▪ lack of childcare; ▪ challenges with rotating work schedules; ▪ lack of affordable and safe transportation; or ▪ gendered power dynamics in communities that limit women’s opportunities. <p>In addition to gendered considerations, the proponent should explore opportunities to investigate intersecting identities and systems that shape lived experience and knowledge. Applying an intersectional approach will help identify and potentially mitigate for the differential impacts on diverse groups of women, men and/or gender. Once differences and specific needs are identified, targeted actions can be designed to mitigate for potential perpetuation of inequalities.</p> <ul style="list-style-type: none"> • For example, mitigation measures that only address sexism or policies to hire more women generally fail to address the unique and intersecting impact of sexism and racism for Indigenous and racialized women. Women living with disabilities can face multiple intersecting points of discrimination leading to barriers in the workplace and labour force (see: Buettgen et al., 2018, DAWN Canada, 2019) (Source: IAAC’s GBA Plus Guidance).
WAGE-05	8.3 Engagement Principles (page 41)	<p>WAGE is pleased that “SMG is inclusive in its engagement activities and works to identify those potentially affected by the Project in a manner consistent with the principles of Gender-Based Analysis Plus (GBA Plus)”.</p> <p>Because the full benefits of GBA Plus are best achieved when the practice is embedded across all functional areas, WAGE encourages the Proponent to promote Introductory GBA Plus training with all staff contributing to the Project, regardless of their role.</p>
WAGE-06	<p>10.0 Human and community well-being:</p> <ul style="list-style-type: none"> ▪ 10.1 Local Government (page 80-81) 	<p>Currently, minimum population data is included in the IPD. As GBA Plus is to be used to guide practitioners in identifying who is impacted by a project and assess how they may experience impacts differently, WAGE recommends that baseline information about the community should:</p>

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	<ul style="list-style-type: none"> ▪ 10.2 Local and Regional Economy (page 81, 82) ▪ 10.5 Health Conditions (page 83) 	<ul style="list-style-type: none"> ▪ include qualitative and quantitative data that presents a detailed socioeconomic profile of the community; ▪ disaggregate data by gender, age, ethnicity, Indigeneity, ability and any other community-relevant identity factors; ▪ incorporate, where possible, information from government statistics, non-governmental organization reports, academic sources and community consultations. These sources can be used to describe community contexts (including history), existing inequalities, and existing gender issues in the community (e.g., gender-based violence, gendered divisions of labour, and gender roles, responsibilities, decision-making/resource control); and ▪ complement existing data sources with community-developed indicators and locally collected data (see, for example, Shandro et al., 2014)(Source: IAAC's GBA Plus Guidance).