

Enclosure 2: Federal Authority Advice Record: Summary of Issues, and Potential Tailored Impact Statement Guidelines and Plans

Project: Hydrogen Ready Power Plant Project

Proponent: Eastern Power Inc.

CIAR No.: 83696

Response due by: **July 6, 2022**

All comments should be submitted via the **Submit a Comment** feature available on the Project's Canadian Impact Assessment Registry page (Reference 83696)¹. Letters and forms can be uploaded using this feature. If you have any difficulties submitting this way, please contact the Agency at *Hydrogen-Hydrogene @iaac-aeic.gc.ca* for assistance.

Department/Agency: Women and Gender Equality Canada (WAGE)	
Date of Advice: 2022-06-16	
Primary Contact Name, Title, Work Unit: Denise Gareau, Director, GBA Plus Directorate, Research Results & Delivery and Center of Expertise Branch.	
Email: FEGC.EvaluationImpacts-ImpactsAssessment.WAGE@fegc-wage.gc.ca	Phone: 819-938-1132
Alternate Contact Name, Title, Work Unit: Jessica Bialek, Analyst, GBA Plus Directorate, Research Results & Delivery and Center of Expertise Branch.	
Email: Jessica.Bialek@fegc-wage.gc.ca	Phone: 819-938-1132

1. Expertise

Please identify and describe the specialist or expert information or knowledge within your department or agency that is relevant to an assessment of the Project.

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 Gender-based Analysis Plus (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 racialization, national and ethnic origin,

¹ <http://iaac-aeic.gc.ca/050/evaluations/proj/83696>

Indigenous origin or identity, gender, age, sexual orientation, socio-economic condition, place of residence and disability.

From the perspective of WAGE's mandate and responsible areas, the following issues should be addressed in the impact assessment of the Project:

- **Assessing current realities:** Identify the position of various groups with respect to decision-making, participation, access and control over resources as well as norms, values, and rights. What are the barriers to equality?
- **Inclusion of disaggregated data:** Will data on benefits and negative impacts on diverse people be counted? If data is limited what steps will be taken to ensure that the needs of diverse people are understood and reflected in the Project design?
- **Analysis of differential impacts:** Do diverse populations get a fair share of the benefits associated with the Project? Are some disproportionately affected by the negative consequences (e.g., Gender - based violence)? Will historical gaps and perceptions prevent certain people from benefiting from the Project equally?
- **Engagement of diverse people in a culturally-sensitive manner:** Have people and particularly those who are marginalized been consulted? How will the views and perspectives of these people help shape the Project?
- **Are investments distributed across different groups:** What will be done to ensure that the Project serves to strengthen capacities and quality of life for diverse groups and individuals?
- **Mainstreaming equality:** Does the Project seek to address the identified needs of various people? Do project outcomes include a broader commitment to improving equality and not perpetuating norms and structures that contributed to these inequalities?
- **Information on those implementing the Project.** Does the business have equality, anti-harassment or other relevant policies in place? Is the current workforce diverse? Is there a history of abuses or infractions as it relates to social justice issues? Is training provided on issues related to equality, diversity and inclusion to ensure that the implementation team has **the skill, knowledge, and commitment to positive change** to bridge gaps in a lasting manner?

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. Key issues and solutions

Respond to the following **using Table 1 on page 3**

(a) From the perspective of the mandate and area(s) of expertise of your department or agency, what are the key issues that are material and relevant to decision-making and should be addressed? In identifying key issues, be mindful of the Project's context (size, scope, geography, policy) and the definitions of *effects*,² *sustainability*³ and *public interest*.⁴

(b) For each **key** issue:

- i. Identify the relevant valued component(s) within your mandate and describe the key pathway of effect, or describe the nature of the issue. This may consider⁵ positive and negative effects on components of the environment or on health, social and economic conditions.
- ii. Identify any clarifications or commitments the Proponent could make in its Detailed Project Description and Response to the Summary of Issues that would build confidence that issues can be addressed and managed without further impact assessment⁶, or that can help focus the Tailored Impact Statement Guidelines⁷, if an impact assessment is required.
- iii. Identify, at a very high-level, any information or studies that should be required of the Proponent in the Tailored Impact Statement Guidelines, if an impact assessment is required.⁸

(c) For each issue and solution discussed, provide a concise, plain-language summary that is appropriate for inclusion in the Summary of Issues.

3. Operational guidance and powers, duties and functions

(a) Within the mandate and area(s) of expertise of your department or agency, list specific operational policies or guidance documents that could help address issues and manage effects relevant to the project context.

- Guidance: Gender Based Analysis Plus in Impact Assessments: <https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/gender-based-analysis.html#toc9>
- Gender-based Analysis Plus course: [Introductory GBA Plus training](#)

² Note: *effects*, *direct and incidental effects*, and *effects within federal jurisdiction* are defined in section 2 of the *Impact Assessment Act*, which can be found at <https://www.canada.ca/en/impact-assessment-agency/corporate/acts-regulations/legislation-regulations.html>

³ Guidance: Considering the Extent to which a Project Contributes to Sustainability <https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/guidance-considering.html>

⁴ Policy Context: Public Interest Determination under the *Impact Assessment Act* <https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/public-interest-determination-under-impact-assessment-act.html>

⁵ Other considerations may include sources of high uncertainty that complicate predictions; the purpose and need for the Project and selected alternatives.

⁶ This could mean that mitigation measures that the proponent has committed to in the Detailed Project Description are referenced in the Tailored Impact Statement Guidelines.

⁷ For example, regulatory instruments, operational guidance or well-understood mitigation and monitoring measures of proven effectiveness.

⁸ Federal authorities are being asked what should be included in the Tailored Impact Statement Guidelines with specific rationale that is commensurate to the project context. Please also identify studies that are not necessary based on the information provided by the proponent and based on project context.

(b) List the potential powers, duties, or functions, including federal funding, that your department or agency may be required to exercise or perform to enable the Project to proceed, in whole or in part. Validate whether the information in the Initial Project Description is accurate.

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

(c) For each power, duty or function:

- i. Explain any associated framework to address effects on valued components within your mandate.
- ii. Describe any Indigenous consultation activities that would occur, potential timelines for Indigenous participation, and how potential impacts to Indigenous communities are addressed by your department or agency.
- iii. Describe any public participation opportunities that would occur, and potential timelines for public participation.

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

(d) Has your department or agency already exercised a power, or performed a duty or function, under any Act of Parliament in relation to the Project; or taken any course of action that would allow the Project to proceed in whole or in part? Specify as appropriate.

N/A

4. Is there any additional information related to the geographic context of the Project (e.g. potential effects to Indigenous protected and conserved areas, migratory bird sanctuaries, federal species at risk) for which your department or agency has information or authority?

No

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 benefitting 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%208%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 and equality analysis as it related to the social, economic and health impacts, such as gender and poverty, division of labour, the differential situation of different groups vis-à-vis indicators (such as literacy, land access, participation in fishing/ agriculture, political participation, etc.). This information would help clarify the current situation as it relates to differences and disparities between individuals and groups and to help identify whether certain populations face barriers to benefiting from the project or are at greater risk of being negatively impacted by the effects of the initiative.

The analysis should extend beyond the descriptive (e.g., percentage of low-income people) to address critical questions about norms, roles and relations and how these may influence power relations (e.g., who has what, who does what, etc.) in a particular context/community. A robust baseline, should also demonstrate linkages between the economic, social 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). For example, could social norms related to the behaviour of younger women create restrictions in attending public events, or being disproportionately burdened by household chores or child care responsibilities? Should these younger women also be from lower socio-economic groups and have limited educational attainment levels, would they have the confidence to raise their views and would their perspectives have weight in a townhall meeting for example.

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 a diversity of 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. 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 – inequalities in the communities. The Impact Statement should demonstrate how engagement of community members has increased understanding of adverse impacts and informed mitigation measures to enhance positive impacts.

Access and control over resources

Access and control over resources relates to both the availability of resources, and the benefits that come from their use. The 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 describe who accesses these resources. For example, if traditional livelihoods are affected and certain groups lack the required skills for employment, the proponent might consider ways to remove barriers through targeted activities and supports. In addition to direct employment, the Proponent could consider inclusion of underrepresented groups through supply chain arrangements, like for example, procuring goods and services from businesses owned by local, Indigenous persons and/or women.

In addition, to understanding the constraints and barriers faced by certain individuals or groups, the Impact Statement should include a description of the social norms and broader social power structures. Social norms refer to the rules and accompanying behaviours that govern social behaviour and expectations. Both formal and informal rules govern market behaviours. The ‘informal rules’ include norms (or what we call “social norms”) and relations (meaning the power dynamics between people). For example, women often occupy different economic spheres, due to social norms that define acceptable roles and behaviours for women. Across most contexts, women are more likely to work as unpaid family workers, in the informal sector or part-time so that they can combine work with care responsibilities. Even in formal employment, in many contexts women tend to work in “female” occupations for lower returns.

Economic opportunities

Economic opportunities and access to financial benefits of projects is often limited for some populations. Moreover, the Impact Statement should describe whether the project will generate significant benefits and opportunities for local communities (e.g., who from the communities will benefit) and the potential for differential benefits, including opportunities for women, persons with disabilities or Indigenous peoples in the Project workforce. It should also outline the current rates of employment and describe differences between and among subgroups 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 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 extraction development and infrastructure sector. The Impact Statement should identify and assess the potential issues of GBV (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 systemically marginalized 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.

Table 1: Key Issues and Solutions that are Material and Relevant to Decision-making

Comment ID	Document Reference	Valued Component	Description of Key Issue (Context and Rationale)	Solutions for the Proponent	Summary of Issues
<p>Please identify comments by organization and comment number. e.g.: IAAC-01</p>	<p>If the comment is related to a specific section of the Initial Project Description, please provide a reference. You may also choose to copy the relevant text here.</p>	<p>Identify the valued component(s)—within the mandate of your department or agency—to which the effect or issue applies. This may include components of the environment, health, social or economic conditions.</p>	<p>Provide context for the effect or issue. Describe, to the extent possible:</p> <ul style="list-style-type: none"> The positive or negative pathway of effect or nature of the issue Any powers, duties or functions that your department or agency has that may mitigate, manage, or set conditions related to the effect Operational guidance or standard and well-understood mitigation or monitoring measures that would address the effect Any established or emerging policies or directives that are relevant The potential for residual effects after mitigation has been applied 	<p>Where applicable and necessary,</p> <ul style="list-style-type: none"> provide instructions for how the Proponent would build confidence about the management of the potential effect, in the Detailed Project Description and Response to the Summary of Issues, and/or identify, at a high-level, required information or studies to assess the effects, should an impact assessment be required (or templated requirements that are not relevant to the Project). 	<p>For issues and effects to be included in the Summary of Issues, provide a concise, plain language synopsis.</p>
<p>WAGE - 01</p>	<p>4.4 Socio- Economic Impacts (page 46 to 49)</p>	<p>Social</p>	<p>While the Proponent provides some information on St. Clair Township and closest social infrastructure (schools, hospital), it would be helpful to indicate any GBA Plus assessment and include some demographic data, including disaggregated data to indicate various identify factors (at the minimum by age, gender, sex, ethnicity, or other community relevant factors) to support the analysis. For examples, what has been the impact on pass years displacing agricultural uses. Who are being impacted by the industrial growth for which this project will most likely have a cumulative effect? This would enable to Proponent to monitor the potential impact of various population groups.</p>	<p>WAGE recommends adding baseline information about the community that should:</p> <ul style="list-style-type: none"> include qualitative and quantitative data that present a detailed socioeconomic profile of the community; disaggregate the data by gender, age, ethnicity, Indigenous identity, 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) <p>(Source: IAAC’s GBA Plus Guidance).</p> <p>Therefore, WAGE recommends that the proponent commit to the collection of disaggregated data for GBA Plus purposes. This commitment to collect disaggregated data and analyze the evidence by gender/sex/age and other identity factors is to appropriately monitor and mitigate potential benefits and/or adverse effects as they relate to social, economic, health, and community well-being.</p> <p>GBA Plus provides a framework to describe the full scope of potential adverse and positive effects under the proposed IAA (Impact Assessment Act). 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. The application of a GBA Plus is required by the Tailored Impact Statement Guidelines for the following sections:</p> <ul style="list-style-type: none"> 4.4 Alternative means of carrying out the project, 5. Description of Public Participation and Views, 6. Description of Engagement with Indigenous Groups, 7.1. Baseline Conditions/methodology, 9. Baseline Condition – Human Health, 	<p>Additional disaggregated population data is required.</p>

				<ul style="list-style-type: none"> o 10. Baseline Conditions – Social, o 11. Baseline Conditions – Economic, o 12. Baseline Condition – Indigenous Peoples, o 13. Effects Assessment, o 16. Effects to Valued Components – Human Health, o 17. Effects to Valued Components – Social, o 18. Effects to Valued Components – Economic, o 19. Effects to Indigenous Peoples o 20. Mitigation and Enhancement Measures, o 21. Residual Effects, and o 22. Cumulative Effects Assessment o 23. Other effects to Consider o 25. Description of the Project's Contributions to Sustainability o 26. Follow-up Programs. 	
WAGE - 02	4.4.6 Labour Supply and Employment (page 48)	Social	<p>The Proponent’s analysis of labour supply and employment is only based on the ratio of required jobs vs the overall employment population of Lambton County. It would be helpful to continue the analysis by asking the following questions:</p> <ul style="list-style-type: none"> ▪ Within the active labour force (132,972?), what is the proportion within the targeted occupation? ▪ What are the “skills” that the plan requires from the workforce? ▪ As per section 5.4.1. Neighborhood or Community Character (page 46), it says that the “HRPP Project is within St. Clair Township that already hosts several similar electricity generating facilities as well as petrochemical and related heavy industrial facilities.”, does it mean that potentially it will be difficult to find the right workers as they are already employed elsewhere? ▪ During its construction, what is the number of estimated workers? Will they be housed/accommodated? ▪ Are there any planned efforts to hire, train and retain underrepresented groups in the power plan industry? ▪ What are the broader social norms and social power structures, such as legal frameworks, that may impact the ability of women, men, and diverse groups of people to benefit equally from opportunities in this sector? ▪ Are there specific initiatives for hiring and retaining a diverse workforce? In particular, for 	<p>WAGE recommends that the Proponent commit to collecting disaggregated data for GBA Plus purposes. This commitment to collect disaggregated data and analyze the evidence by gender/sex/age and other identity factors to appropriately monitor and mitigate potential benefits and/or adverse effects as it relates to social, economic, health, and community well-being.</p> <p>The Proponent will need to provide a more in-depth analysis, which includes an estimate of the construction workforce and how/where they will be house/accommodated.</p> <p>In addition, the Proponent should also identify and assess the potential issues of gender-based violence (e.g., sexual harassment, violence against women, human trafficking). 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). WAGE would also recommend that potential GBV concerns be considered for both workforce population (Section 4.4.6 Labour Supply and Employment) and general population (Section 4.4.8 Public Health and Safety), within a disaggregated data and intersectional perspective.</p>	Additional data is to be provided for more fulsome analysis regarding labour supply and employment positive and negative effects.

			<p>Indigenous women, who are under-represented in this sector.</p> <ul style="list-style-type: none"> Will their be concrete and meaningful measures to ensure workforce safety and prevent any type of harassment and discrimination of the workforce? 		
WAGE - 03	4.4.8 Public Health and Safety (page 49)	Social	<p>WAGE has some concerns related to the lack of information in the preliminary identification of potential project impacts, Moreover, the only indicator that is used to assess public health and safety concerns relates to airshed.</p> <p>In addition, the analysis does not include potential health, social and economic components based on the Project's social impacts (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 the Project's social impacts.</p> <p>The Proponent should provide a rationale as to why only airshed potential impact is being taking into consideration. Based on data, are there other potential health concerns (e.g., resulting in reduced life expectancy or higher incidence of chronic illness)?</p> <p>The Proponent should include data disaggregated by sex, gender, age, and ethnicity at a minimum to determine whether potential health and safety impacts may result in different impacts (adverse or positive) and develop mitigation measures. This could include programs to support the safety and security of people, including codes of conduct and programs to engage men.</p> <p>The Proponent will need to explore potential risks such as gender-based violence. Also of relevance is the identification of specific population groups among women (e.g., Indigenous, young women) that are often disproportionately affected by these health and safety impacts. Describing risks to sub-populations, while helpful, will need to inform appropriate mitigation measures (e.g., tailored to sub-groups where feasible). The Proponent should also include an overview of the legal framework such as relevant labour laws and policies related to GBV that will subsequently inform relevant mitigation strategies. Background information on GBV impacted communities should also be included.</p> <p>The Proponent should assess the availability and capacity of the local health services and how the project may impact those services given the project's expected workforce during construction and operation.</p>	<p>Would need a more fulsome analysis of health concerns and the project's potential social effects on surrounding communities.</p>
WAGE - 04	5.1 Potentially Affected and Interested Indigenous Groups (page 52)	Social Health	<p>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 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 behaviors. (Source: IAAC's GBA Plus Guidance).</p>	<p>Additional information is required on potential impacts on impacted populations with respect to gender-based violence</p>

<p>WAGE - 05</p>	<p>5.6 Indigenous Consultation and Information Gathering (page 55)</p>	<p>Social</p>	<p>While the Proponent provides an overview of engagement with various Indigenous Council Chiefs, the Impact Statement will require a commitment to provide a description of efforts to engage a diversity of Indigenous community members including, but not limited to, Chief and Council and other formal administrative bodies identified by gender, age, or other identity factors to support the collection of information needed to achieve GBA Plus objectives.</p> <p>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 vulnerable 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.</p> <p>Preliminary identification of potential project impacts did not include potential health, social and economic impacts. Therefore, 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. 	<p>In addition to potential effect identified in the Environmental Screening and Review Report (ESRR), the proponent should be open to engage with Indigenous communities regarding Indigenous knowledge they may wish to apply when considering potential impacts not only environmental, but also regarding potential social, economic and health impacts.</p> <p>The Proponent should adopt an intersectional approach for analyzing data (qualitative and quantitative) considering identity factors such as sex, gender, age and ethnicity.</p> <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; ▪ 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). 	<p>Additional information is required on consultations and on efforts to consult various population groups (women’s groups or other diverse populations groups)</p>
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Please insert additional rows as necessary.