

Comment Form – Draft Permitting Plan and Draft Tailored Impact Statement Guidelines – Federal Review Team

Crawford Nickel Project

Response required by: March 3, 2023

All comments should be submitted via the Submit a Comment feature available on the Project’s Canadian Impact Assessment Registry page (Reference #83857 at <https://iaac-aeic.gc.ca/050/evaluations/proj/83857>). Documents can be uploaded using this feature. If you have any difficulties submitting this way, please contact the registry directly at registry-registre@iaac-aeic.gc.ca. All comments submitted using this table will be posted on the Project’s Registry website.

Please note that this will be your final opportunity to make changes to the Tailored Impact Statement Guidelines. The Agency is required to issue the final Guidelines and plans by day 180 of the Planning Phase, on April 1, 2023.

Department/Agency:	Employment and Social Development Canada (ESDC)		
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Department – Comment	Draft Guidelines Section	Context and Rationale (provide an explanation of your comments)	Recommendation: provide text to be inserted or deleted. Be specific on the location within the draft Guidelines that the text would be added/deleted.
ESDC – 01	3.0 - Project Description	<p>The Proponent articulated the project can provide an overall positive benefit to Indigenous Peoples, particularly regarding economic conditions and outcomes arising from improvements in economic circumstances, however, more detail is needed to adequately assess the economic benefits.</p>	<p>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 needed.</p> <p>Meaningful engagement with Indigenous communities as partners will support the Government of Canada’s reconciliation with Indigenous Peoples.</p> <p>Guidelines should reflect Proponent engagement with training programs such as the Indigenous Skills and Employment Training (ISET) Program and Skills and Partnership Fund.</p> <p>Articulate the intent to support Indigenous recruitment and retention 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 Indigenous under-representation in the project’s workforce.</p> <p>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.</p>
ESDC - 02	3.5 Workforce requirements	<p>The draft Tailored Impact Statement Guidelines (TISG) mentions the anticipated labour requirements, employee programs and policies, and workforce development opportunities for the designated project, but there is no reference that the proponent will reach out to any of the network of Indigenous Training Organizations (e.g.</p>	<p>It is recommended that section 3.5 Workforce requirements of the draft TISG include a description of the partnerships established with Labour Market, employment and training organizations such as the ISET Program service delivery network.</p>

		<p>ISET service delivery network) listed below.</p> <p>Indigenous Skills and Employment Training (ISET) Program</p> <p>The ISET Program provides funding to Indigenous service delivery organizations across Canada that design and deliver job training services to First Nations, Inuit, Métis and urban/non-affiliated Indigenous people in their communities.</p> <p>The ISET service delivery organizations work closely with employers to identify Labour Market needs. Organizations link training needs to the job market by providing skills and training required to find a job such as: a suite of skills development and job training, from essential skills such as literacy and numeracy to more advanced training for in-demand jobs. They also offer a range of wrap-around services (such as help with childcare supports and transportation) during training in order for individuals to achieve long-term career goals.</p> <p>In Ontario, there are currently 22 Indigenous service delivery organizations. 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> <p>Link to the list of ISET service delivery organizations in Ontario: https://www.canada.ca/en/employment-social-development/programs/indigenous-skills-employment-training/service-delivery-organizations.html</p> <p>The ISET service delivery network should be aware of all plans the proponent is supporting related to the project including the timeframe for the employment or opportunity, how long such opportunities will be available, types of jobs available, plans that would</p>	
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		<p>encourage employment, procurement and contracting opportunities for Indigenous peoples and communities.</p> <p>Note: The information pertaining to the ISET service delivery network was provided by ESDC-Skills and Employment Branch-Indigenous Affairs Directorate in August 2022 as part of comments on the draft Initial Project description for the Crawford Nickel Project.</p>	
ESDC - 03	3.5 Workforce requirements	More details on the characteristics of the jobs to be created would give a more fulsome understanding of the mine's impacts on workers and on the local economy.	<p>A bullet to be modified:</p> <ul style="list-style-type: none"> opportunities for employment outlining the anticipated number of full-time and part-time positions to be created by construction, operating, and decommissioning phases, specifying whether these positions are permanent, contract, or induced, and timeline for when they will be created.
ESDC - 04	3.5 Workforce requirements	This information would help to ascertain the quality of jobs created.	<p>A bullet to be added to the list:</p> <p>How employee wages, benefits, and working conditions would compare to local, regional, provincial, national, and industry averages.</p>
ESDC - 05	3.5 Workforce requirements	How layoffs would be managed is an important consideration.	<p>A bullet to be added to the list:</p> <ul style="list-style-type: none"> Assistance for workers who will be laid off once the project reaches the end of its life cycle, or earlier if economic conditions deteriorate.
ESDC - 06	7.2 Selection of Valued Components	<p>It is recommended that baseline information on child care within the broader communities that will be affected by the Crawford Nickel Project and its workforce be provided by the proponent, in addition to baseline information being requested on child care for Indigenous Peoples, be collected by the proponent as part of an understanding of existing and potential impacts on social conditions to the local community.</p> <p>This is recommended under Section 2 (e) of the Impact Assessment Act "any change to a health, social or economic matter that is within the legislative</p>	<p>Other health, social and economic conditions that may contribute to sustainability in Canada, including:</p> <p>Access to child care.</p> <p>We recommend that this component be on the bottom on page 30 of the TISG.</p>

		<p>authority of Parliament that is set out in Schedule 3 of the IAA”.</p> <p>Child care primarily falls within provincial and territorial jurisdiction and as such, proponents should work with the provincial or territorial governments to obtain information on child care.</p>	
ESDC – 07	11.0 - Economic Conditions	<p>Demonstrate how any adverse effects to employment would be managed, mitigated and/or avoided.</p> <p>Recommend the Proponent re-evaluate their mitigation measures to employment issues that are known to be standard mitigation. For example, if the Proponent finds that particular demographic groups are systematically under-represented in the industry workforce, it would be strongly recommended the Proponent have a mitigation strategy in place to affect local workforce representation.</p> <p>The opportunity may exist for 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>	No specific proposed wording to include on this section. See rational in column three.
ESDC - 08	11.1 Baseline conditions	Demographic and labour market information on persons living near the project is needed, regardless of the labour force status.	A description of the main economic activities in the study areas, including demographic and labour market information for members of the local and regional population.
ESDC - 09	11.1 Baseline conditions	<p>Unemployment rates would help to evaluate the likely impacts of the project.</p> <p>Existing employment and unemployment rates, principal employment and economic well-being in the study areas and impacted communities.</p>	No specific proposed wording to include on this section. See rational in column three.
ESDC - 10	11.1 Baseline conditions	It is important for the proponent to provide information on the local status of groups that are underrepresented in the labour market, as the improvement of their situation in the labour market is a government priority. This information will help to gauge and improve the likely impacts of the project on these groups.	<p>A bullet to be added:</p> <ul style="list-style-type: none"> Insofar as this is possible, describe baseline conditions using disaggregated demographic information with respect to other groups that are underrepresented in the labour market, such as women, youth, recent

			immigrants, visible minorities, and persons with disabilities.
ESDC - 11	11.2.1 Employment	While there is reference in the draft TISG that there that will be training programs and/or other initiatives that will improve employment for Indigenous Peoples it is strongly recommended that the scope and details pertaining to the Crawford Nickel Project activities, such as type and number of jobs, timelines, and any other relevant information, be shared with the surrounding Indigenous communities, ISET service delivery network (listed above), so that training partners can work to prepare their clients to be ready to access these jobs. In addition, meetings should be arranged in order for the ISET service delivery network to provide information on the labour force/potential employees, given they are largely aware of individuals who have already been trained or who could be trained to access these jobs.	It is recommended that under section “11.2.1 – Employment” that the draft TISG should also include a description of the partnerships established with Labour Market, employment and training organizations like the ISET Program service delivery network.
ESDC - 12	11.2.1 Employment	Targets must be accompanied by plans to meet them.	An estimate of the target workforce for each phase of the Project based on demographic profiles such as biological (sex), socio-cultural (gender), and identity factors (race, ethnicity, religion, age, and mental or physical disability), as well as reasons for the levels of the targets and plans to achieve them.
ESDC - 13	11.2.2. Business environment and local economy	The project’s approximate budget and amounts to be spent locally should be noted to better evaluate its likely economic impacts.	A bullet to be added to the list: Note the project’s approximate budget, and the amount and proportion of this budget to be spent locally.
ESDC - 14	11.2.2. Business environment and local economy	A better understanding of the project’s local impacts will help to evaluate it.	Describe economic benefits to the economy as a whole and to the region where the project will occur.

ESDC - 15	11.2.2. Business environment and local economy	The project's life expectancy, from its very beginning until the end of decommissioning, is an important consideration.	Add this bullet to the first list of bullets: Specify the lifespan of the project.
ESDC – 16	12.3- Health, Social, and Economic Conditions of Indigenous Peoples	More detail surrounding projected employment opportunities is required to adequately assess the economic benefits stemming from the Project.	<p>Guidelines should include community consultation by the Proponent and engagement with Wabun Tribal Council (WTC) members to develop a partnership that supports employment outcomes and child care supports.</p> <p>It is strongly recommended the Proponent explicitly identify whether Indigenous individuals and businesses will receive prioritized employment opportunities.</p> <p>The Proponent should provide a detailed account of the following information related to local socioeconomic conditions, including:</p> <p>The labour force characteristics of all impacted communities including the availability of skilled and unskilled workers, existing working conditions, wages and/or average salary range, full-time and part-time employment and training.</p> <p>Employment barriers to participation for local under-represented groups.</p> <p>Details on any commitments to maximize positive socio-economic outcomes for local communities, as well as the provision of a detailed hiring strategy.</p> <p>The Proponent should provide their employees/staff with resources to facilitate engagement and ensure cultural awareness of the local Indigenous communities.</p>