

## Enclosure 2: Federal Authority Advice Record – Summary of Issues, and Potential Tailored Impact Statement Guidelines and Permitting Plan

**Project:** Northern Road Link Project

**Proponent:** Marten Falls First Nation and Webequie First Nation

**CIAR No.:** 84331

**Response due by:** **March 17, 2023**

All comments should be submitted via the **Submit a Comment** feature available on the Project's Canadian Impact Assessment Registry page (Reference 84331)<sup>1</sup>. Letters and forms can be uploaded using this feature. If you have any difficulties submitting this way, please contact the Agency at [NorthernRoad-RouteDuNord@iaac-aeic.gc.ca](mailto:NorthernRoad-RouteDuNord@iaac-aeic.gc.ca) for assistance.

<b>Department/Agency:</b> Women and Gender Equality Canada (WAGE)	
<b>Date of Advice:</b> 2023-03-13	
<b>Primary Contact Name, Title, Work Unit:</b> Denise Gareau, Director, GBA Plus Directorate, Research Results & Delivery and Center of Expertise Branch	
<b>Email:</b> <a href="mailto:FEGC.EvaluationImpacts-ImpactsAssessment.WAGE@fegc-wage.gc.ca">FEGC.EvaluationImpacts-ImpactsAssessment.WAGE@fegc-wage.gc.ca</a>	<b>Phone:</b> 819-938-1132
<b>Alternate Contact Name, Title, Work Unit:</b> Jessica Bialek, A/Senior Analyst, GBA Plus Directorate, Research Results & Delivery and Center of Expertise Branch	
<b>Email:</b> <a href="mailto:Jessica.Bialek@fegc-wage.gc.ca">Jessica.Bialek@fegc-wage.gc.ca</a>	<b>Phone:</b> 819-360-8268

### 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.

Women and Gender Equality Canada (WAGE) holds expertise in the application of GBA Plus (as intersectional analysis) as well as information related to gender-based violence.

#### Description:

WAGE's mandate 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.

<sup>1</sup> <http://iaac-aeic.gc.ca/050/evaluations/proj/84331?culture=en-CA>

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, Indigenous 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?

## 2. Key issues and solutions

Respond to the following **using Table 1 on page 4**

(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*,<sup>2</sup> *sustainability*<sup>3</sup> and *public interest*.<sup>4</sup>

(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 consider<sup>5</sup> 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 assessment<sup>6</sup>, or that can help focus the Tailored Impact Statement Guidelines<sup>7</sup>, 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.<sup>8</sup>

(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.

Additional information on GBA Plus and diversity analysis is available at the following links and an **Overview of Gender-based Analysis Plus (GBA Plus)** has been added on pages 7 to 9 for your awareness.

IAAC:

- [Policy and guidance - Canada.ca](#)
- [Guidance: Gender-based Analysis Plus in Impact Assessment - Canada.ca](#)
- <https://research-groups.usask.ca/reed/documents/CEAA%20Report.FINAL.%20Walker%20Reed%20Thiessen.%20Gender%20Diversity%20in%20IA.Feb%208%202019.pdf>

<sup>2</sup> 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>

<sup>3</sup> 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>

<sup>4</sup> 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>

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

<sup>6</sup> This could mean that mitigation measures that the proponent has committed to implement, in the Detailed Project Description, are referenced in the Tailored Impact Statement Guidelines.

<sup>7</sup> For example, regulatory instruments, operational guidance or well-understood mitigation and monitoring measures of proven effectiveness

<sup>8</sup> Federal authorities are 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 necessarily based on the information provided by the proponent and based on project context.

WAGE:

- [Take the Gender-based Analysis Plus course - Women and Gender Equality Canada](#)
- [What is gender-based violence? - Women and Gender Equality Canada](#)

(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, function or duties. WAGE holds expertise in the application of GBA Plus (an intersectional analysis) as well as information related to gender-based violence.

(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.

N/A

(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 your department or agency aware of 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, sensitive/vulnerable health, social or economic conditions)?

N/A

Table 1: Key Issues and Solutions 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"> <li>The positive or negative pathway of effect or nature of the issue</li> <li>Any <b>powers, duties or functions</b> that your department or agency has that may <b>mitigate, manage, or set conditions</b> related to the effect</li> <li><b>Operational guidance</b> or standard and well-understood <b>mitigation or monitoring measures</b> that would address the effect</li> <li>Any <b>established or emerging policies or directives</b> that are relevant</li> <li>The potential for <b>residual effects</b> after mitigation has been applied</li> </ul>	<p>Where applicable and necessary,</p> <ul style="list-style-type: none"> <li>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</li> <li>identify, at a high-level, required information or studies to assess the effects, should an impact assessment be required (or templated requirements that are relevant to the Project).</li> </ul>	<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>5.3.1 General Engagement Principles p.21, and  5.6 Record of Consultation (RoC) p.27</p>	<p>Social conditions and Engagement</p>	<p>WAGE is satisfied with the general Engagement Principles described as: Meaningful, Transparent, Inclusive and Accessible, Flexible and Collaborative. However, the best approach to embedding GBA Plus in the design and implementation of engagement and consultation is to ensure broad participation by asking “Who is at the table?” and most importantly “Who is missing?”.</p> <p>The IPD clearly show the Proponents openness to including all people affected by the Project. However, the RoC does not refer to how inclusion will be tracked nor how gaps in representation will be addressed. Participation of groups should be assessed by various identity factors (e.g., Indigenous identity, age, gender, 2SLGBTQI+, people with disabilities, location. Also, meaningful and inclusive engagement is best achieved through monitoring participation from an intersectional perspective (e.g., Indigenous women living in rural community, young men with high school diploma, etc.). The advantage of such monitoring is that it helps with the identification of accessibility barriers faced by certain people from diverse backgrounds and with different lived experiences.</p> <p>See IAAC’s <a href="#">Tool – Assessing the Quality of a GBA Plus in the Impact Statement</a></p>	<p>In accordance with IAAC’s GBA Plus Guidelines, ensuring broad participation and asking "who is at the table and who is missing?" helps practitioners develop relationships within the community to support the accurate scoping of potential issues of importance to communities within the impact assessment. Asking critical questions and tracking about who is represented can also expose existing power inequities that limit participation by some individuals or groups.</p>	<p>To increase engagement monitoring</p>
<p>WAGE – 02</p>	<p>16.1 Human Health Context p.102</p> <ul style="list-style-type: none"> <li>16.1.1 Preliminary Baseline Description, and</li> <li>16.1.2 Proposed Baseline Studies</li> </ul> <p>And</p> <p>23.1 Human Health p.141</p> <ul style="list-style-type: none"> <li>23.2.2 Potential Effects</li> <li>23.1.2 Preliminary Proposed Mitigation</li> </ul>	<p>Community Health</p>	<p>The current description of “Human Health”, is: “The human health baseline will draw on baseline information from other components of the environment that may influence human health such as noise, air quality, surface water, geology, terrain and soils, as well as knowledge gathered with respect to country foods and community diet.”</p> <p>However, this definition is limited to biophysical issues. As per IAAC’s <a href="#">Analyzing Health, Social and Economic Effects under the Impact Assessment Act</a>, “When assessing health effects, it is important to start from an understanding of health that is holistic. The World Health Organization defines health in the following way:</p> <p>“A state of complete physical, mental, and social well-being, and not merely the absence of disease or infirmity.”</p>	<p>WAGE recommends reviewing the health dimensions to include both biophysical and social health components. This could include health behaviors (e.g., alcohol and illicit drug use), mental health and well-being (e.g., access to services, perceived mental health, feelings of isolation), social environment (e.g., community safety, gender-based violence) or all other determinant that see fit (see Table 3: Linking health as a valued component to the determinants of health included in IAAC’s <a href="#">Analyzing Health, Social and Economic Effects under the Impact Assessment Act</a>).</p> <p>In addition, it should take into consideration a GBA Plus approach within section 16.2.2 (see p. 106).</p>	<p>To review the health dimensions so as to include both biophysical and social health components.</p> <p>To take into consideration a GBA Plus approach.</p>

Comment ID	Document Reference	Valued Component	Description of Key Issue (Context and Rationale)	Solutions for the Proponent	Summary of Issues
			<p>In addition, there are concerns related to the lack of GBA Plus considerations in the Health Baseline Studies under section 16.2.2 as health effects are likely to affect different groups and subpopulations differently depending on a range of factors including socio-economic conditions, location and more specifically, proximity to the site, the use of the land and their baseline health status.</p>		
WAGE – 03	<p>16.3 Socio-economic Context - Community Safety p.105</p> <p>And</p> <p>23.2 Socio-Economic Environment p.142</p> <ul style="list-style-type: none"> <li>▪ 23.2.1 Potential Effects</li> <li>▪ 23.2.2 Preliminary Proposed Mitigation</li> </ul>	Community Safety / Gender-based Violence / Social Conditions	<p>WAGE is satisfied that Gender-Based Violence (GBV) towards Indigenous women and girls will be of considered in the implementation of this Project. However, GBV is not only a Community Safety issue, but also one of health as mentioned under comment WAGE-02. Therefore, in addition to crime rate, other indicators should be taken into consideration such as:</p> <ul style="list-style-type: none"> <li>▪ Health indicator: sexually transmitted infections, unwanted pregnancies/abortion, adolescent birth rate (WAGE’s GBV page: Infographic: <a href="#">GBV Overview</a>; and WAGE’s GRF page: <a href="#">Gender Results Framework (GRF)</a>).</li> <li>▪ Safety indicator: self-reported incidents of GBV, such as unwanted sexual behaviours in the workplace or in a public place, harassment, intimate partner violence, sexual assault (WAGE’s GBV page: <a href="#">What is gender-based violence?</a>). Human trafficking may also be of concern (source: <a href="#">National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019</a>)</li> </ul> <p>WAGE would also encourage consideration of the longer-term risks related to GBV. Risks specific to Project development (risk linked to the worker camps near the Indigenous community) have been considered but with the construction of a new all-season road with the intention of stimulating and facilitating future resource development in the Ring of Fire, there will be increased employment in industries with a predominately male workforce.</p>	<p>WAGE recommends reviewing the GBV risks by considering both the health and safety. Research has highlighted the links between resource development projects and risks of GBV 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).</p> <p>In addition, taking into consideration that this Project is to increase the road connection with the highway network and that statistics reveal that Indigenous women are particularly at risk (source: <a href="#">National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019</a> (p. 570), and <a href="#">Trafficking in persons in Canada, 2021 (statcan.gc.ca)</a>), human trafficking should be part of the GBV assessment.</p> <p>Potential indicators of mitigation measures could include: Number of policies, including strict enforcement of Code of Ethics, Respectful Workplace, and Drug and Alcohol Policies, to establish clear expectations for ethical behavior, and to maintaining open dialogue and regular communication, including robust workplace education and sensitivity training. Enforcement must include real consequences for harassing or violent behavior. (Source: IAAC’s GBA Plus Guidance).</p>	To increase health and safety protections to address risks of increased levels of gender-based violence (GBV)
WAGE – 04	<p>23.1 Human Health p.141</p> <ul style="list-style-type: none"> <li>▪ 23.2.2 Potential Effects</li> <li>▪ 23.1.2 Preliminary Proposed Mitigation</li> </ul> <p>And</p> <p>23.2 Socio-Economic Environment p.142</p>	GBA Plus	<p>The current assessment of socio-economic impacts and the corresponding proposed mitigations does not reflect the intersectional principles that are part of robust GBA Plus. More specifically, to help ensure that employment opportunities are enjoyed by diverse groups, especially in male dominated industries, targeted measures are required to include under-represented groups. For example, to be more inclusive of people of all genders as part of the workforce, there could be opportunities for special measures to encourage the recruitment, development and retention of people of other genders in the</p>	<p>WAGE recommends that effects and mitigations measures also be considered within the GBA Plus as this type of analysis is used not only to identify who is impacted by a project, but also to assess how people may experience impacts differently in order to improve project design and develop mitigation measures that address these differential impacts (source: <a href="#">IAAC’s GBA Plus Guidance</a>)</p>	From the results of the GBA Plus, to put in place mitigation measures that consider the differential impacts of various population groups.

Comment ID	Document Reference	Valued Component	Description of Key Issue (Context and Rationale)	Solutions for the Proponent	Summary of Issues
	<ul style="list-style-type: none"> <li>▪ 23.2.1 Potential Effects</li> <li>▪ 23.2.2 Preliminary Proposed Mitigation</li> </ul>		workforce. This could include special programs to increase the recruitment of women or other groups that face barriers to the construction industry?		

Please insert additional rows as necessary.

## 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>
- <https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/tool-assessing-quality-gba-plus-impact-statement.html>

### 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.