

**ATTACHMENT: April 25, 2023**  
**Federal Authority Advice Record**

**Response due by May 25, 2023**

Aspen Power Station Project, Saskatchewan Power Corporation  
Agency File: 84525

Department/Agency	Women and Gender Equality Canada (WAGE)
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1. Is it probable that your department or agency may be required to exercise a power or perform a duty or function related to the Project to enable it to proceed?

If yes, specify the Act of Parliament and that power, duty or function.

1b. Please describe any Indigenous or public consultation that will be undertaken in relation to the exercise of that power, duty or function, including when it would take place.

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

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2. Is your department or agency in possession of specialist or expert information or knowledge that may be relevant to the conduct of an impact assessment of the Project?

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

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3. Has your department or agency considered the Project; 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?

No.

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4. Has your department or agency had previous contact or involvement with the proponent or other party in relation to the Project? (for example: an enquiry about methodology, guidance, or data; introduction to the project)

No.

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5. Does your department or agency have additional information or knowledge not specified, above, including information on the geographic, environmental, economic or social context of the project? (e.g. location of protected or sensitive areas, previous history between local communities and proponent or similar projects, local or regional social or economic concerns)?

No.

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6. What are the key issues likely to be relevant to the public interest decision, based on the mandate and area(s) of expertise of your department, and which should be addressed in an impact assessment of the Project, should the Agency determine that one is required?

For each key issue:

- Describe the effect or the nature of the issue, including any relevant context;
- Provide the rationale and/or evidence for why it is a key issue;
- Identify briefly solutions to the issue, including any information or studies that should be required in the Tailored Impact Statement Guidelines, potential mitigation measures, and/or regulatory requirements relevant to the issue;
- Provide a concise, plain-language summary of the issue for inclusion in the Summary of Issues.

The information provided will be used by the Agency to determine if and an impact assessment is required and where appropriate to develop project-specific draft Tailored Impact Statement Guidelines that focus on the key issues likely to be relevant to the public interest decision.

Please use table 1 to respond to this question

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7. Where possible, identify any clarifications or additional information the Proponent could include in the Detailed Project Description or in the response to the Summary of Issues that would:

- give confidence that an issue or effect could be addressed and managed;
- inform the decision as to whether an impact assessment is required; or
- aid in tailoring the Impact Statement Guidelines, if an impact assessment is required.

These clarifications and additional information will be included as specific questions in the Summary of Issues provided to the proponent

Please use table 2 to respond to this question

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Denise Gareau

Name of Departmental / Agency  
Responder

Director

Title of Responder

Fill in

Date

**Table 1: Key Issues to inform decision-making**

The Agency asks that federal authorities align expert advice with the Agency’s approach to tailoring, which focuses on key issues or effects that are likely to be relevant to the public interest decision. In identifying key issues, federal authorities should be mindful of the Project’s context (size, scope, location), Indigenous knowledge and perspectives, and public concerns. Key issues that may be relevant to the public interest decision include:

- effects that may be significant, based on federal experts’ knowledge and experience with past projects;
- effects that may impact Indigenous peoples and their rights, based on Indigenous knowledge and perspectives or experience with past projects;
- effects on key species or habitats (e.g. at risk, important to Indigenous communities, commercial importance, provide important ecosystem function);
- issues or effects that may result from novel project activities, components or technology;
- effects with large uncertainties, including in the effectiveness of mitigation measures;
- transboundary effects where mitigation measures are limited;
- positive effects, including where project may support other governmental priorities, including reconciliation with Indigenous peoples; and
- key concerns raised by Indigenous or local communities.

Effects that are anticipated to be minor or which can be managed using well understood mitigation measures, existing guidance, and/or other regulatory processes may have simplified information requirements or may be removed entirely. Measured advice from federal authorities on key issues and solutions —and on the scope and detail of any required information and studies — will enable the Agency to focus assessments on issues that are important to participants and to decision-makers.

Comment ID	Valued Component or Factor to Consider	Description of Key Issue (Context and Rationale)	Solutions	Plain language summary for inclusion in Summary of Issues
<p>Please identify comments by organization and comment number.  e.g.: IAAC-01</p>	<p>Identify valued component(s) or factor to consider— within the mandate of your department or agency—to which the effect or issue applies.</p>	<p>Provide a brief description of the issue and rationale for being a key issue.  Include, where relevant,:</p> <ul style="list-style-type: none"> <li>• the pathway of effects;</li> <li>• social, economic or environmental context which are relevant to it being a key issue;</li> <li>• key uncertainties that should be addressed in the impact assessment;</li> <li>• Indigenous or public concerns or perspective;</li> <li>• potential for differential effects among diverse subgroups;</li> <li>• scientific evidence or traditional knowledge, including from past project experience, which supports inclusion as a key issue.</li> </ul>	<p>Where applicable, briefly identify solutions to address the potential issue or effects including</p> <ul style="list-style-type: none"> <li>• Information or studies required to describe and characterize the effect, should an impact assessment be required; including any guidance for data collection and/or analysis or existing data sources to inform the assessment;</li> <li>• Any powers, duties or functions that your department or agency has that may mitigate, manage, or set conditions related to the effect;</li> <li>• Guidance or policies for mitigating effects or any standard and well-understood mitigation measures that would address the effect, including follow-up monitoring activities; and/or</li> <li>• Commitments the proponent could make to respond to the issue.</li> </ul> <p>Where available, please refer to existing text in the TISG template.</p>	<p>For issues to be included in the Summary of Issues, provide a concise, plain language synopsis of the key issue and any questions or directions for the proponent.</p>
WAGE-01	Social conditions and engagement	<p>SaskPower states that they are committed to an inclusive engagement and consultation process. <b>Section 3 Public Engagement Summary and Section 4 Indigenous Engagement Summary</b> notes the various engagement activities held and specific to Indigenous communities, it reports that “no issues have been raised by Indigenous groups to date regarding the Project (<b>Section 4.3</b> pg. 4.8) and “no concerns regarding potential effects on health and socio-economic conditions, physical and cultural heritage, any structure, site, or thing that is of historical, archaeological, palaeontological, or architectural significance have been raised during engagement with Indigenous groups” (<b>Section 13.5</b>, pg. 13.3).</p> <p>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 IPD 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,</p>	<p>Where possible include data of those consulted and engaged. In the IPD, <b>15.4 Health, Social or Economic Derived from Engagement</b> states that engagement and consultation activities to date have been inclusive of women and diverse groups. However, it is not clear how this process was inclusive or will continue to be.</p> <p>In accordance with <a href="#">IAAC's GBA Plus Guidelines</a>, 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>Should an Impact Assessment be required, note that as per section 6.2 Record of Engagement of the <a href="#">TISG</a> template, usually the following is required:</p> <ul style="list-style-type: none"> <li>▪ “a description of efforts to engage diverse populations of each Indigenous community in culturally appropriate ways, including groups identified by gender, age or other community relevant factors (e.g. hunters, trappers, and other</li> </ul>	To increase engagement monitoring.

		<p>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>harvesters) to support the collection of information needed to complete the GBA+"; and</p> <ul style="list-style-type: none"> <li>a description of how engagement activities by the proponent were intended to ensure Indigenous groups were provided an opportunity to evaluate the designated project's potential positive and negative effects and impacts on their members, communities, activities, and rights, as identified by the Indigenous group(s)."</li> </ul>	
WAGE-02	Economic conditions (Employment)	<p>Regarding Employment, <b>Section 15.3 Regional Economic Description</b> states that peak construction for the Project is estimated to be 450 employees and that "during construction, it is anticipated that the Project will create extensive temporary employment opportunities in a broad range of positions" (pg. 15.5) and states that the Project will employment opportunities for approximately 25 full time staff at the Project (<b>Section 19.1.6.2</b>, pg. 19.10). A stipend will be provided to employees for commuting and/or accommodations in place of a temporary labour camp. "SaskPower has not heard any concerns about potential effects to vulnerable populations. The community has hosted and is hosting construction camps. We recognize that there may be impact if a construction camp is required and are committed to ensuring it is implemented in a safe and responsible way." (pg. 15.6) The IPD also notes that "the Project is not expected to result in negative effects to vulnerable population groups or result in gender-based violence." (pg. 19.25)</p> <ul style="list-style-type: none"> <li>WAGE recommends the proponent consider gender-based violence as a potential impact as a result of an influx of non-local workers into the community. This consideration would acknowledge the relationship of a predominately male workforce with the community (especially Indigenous women and girls, and gender diverse peoples) and with women identifying and gender-diverse workers. For example, a recent study revealed the increase of gender-based violence against Indigenous women, girls, and gender-diverse peoples in proximity to work camps <a href="https://www.saltwire.com/nova-scotia/news/remote-work-man-camps-in-canada-linked-to-violence-against-indigenous-women-report-100812324/">https://www.saltwire.com/nova-scotia/news/remote-work-man-camps-in-canada-linked-to-violence-against-indigenous-women-report-100812324/</a></li> </ul> <p>For recruitment it is stated that "employment and procurement programs will be developed that actively promote local opportunity, including for Indigenous workers and businesses, taking into consideration the competitiveness and relative capacity of local suppliers." (pg. 19.15) There is some concern regarding the risk of labour shortage during construction is high due to competing projects in the region (pg. 15.6). As a result, the Project may require employees to travel from other provinces throughout the Project activities.</p> <ul style="list-style-type: none"> <li>With this information it is not quite clear how the recruitment and hiring process will be inclusive. While there is helpful data of the regional area regarding employment of the population and the areas of occupation (e.g., oil and gas) in <b>Section 15.2. Regional Social Description</b> and <b>Section 15.3 Regional Economic Description</b> includes data of age and, Indigenous identity, and some inclusion of households (e.g., one-parent household) (pg. 15.2). However, despite the efforts to include such data there is no further breakdown of this information. For example, what is the employment/unemployment rate for women? Will the proponent be seeking to recruit women and others who are often underrepresented in the oil and gas industry (<a href="#">Employment characteristics for the oil and gas sector (statcan.gc.ca)</a>)?</li> </ul> <p>In <b>Section 15.2.1 Gender-based Analysis Plus</b> it is stated that SaskPower has multiple Employee Resource Groups which focus on culture of growth and inclusion, including: Indigenous Employees Network, Women's Resource Group, and Cultural Diversity Group (to name a few) (pg. 15.3).</p> <ul style="list-style-type: none"> <li>It is not clear how these resources groups will be leveraged throughout the recruitment and employment period of the Project.</li> </ul>	<p>As per the TISG Section 11. Baseline Conditions – Economic, best practice are to include describe the labour force and describe the demographic features of the local and regional population. While some of this data has been provided in the IPD, the baseline information must be sufficiently disaggregated and analysed to support the analysis of disproportionate effects as per GBA Plus.</p> <p>This addition will help fulfil Section 18. Effects to Valued Components – Economic of the TISG as the Impact Statement must apply GBA Plus across all effects and document how potential effects of changes to economic conditions could be different for particular subgroups, including Indigenous people or other community relevant subgroups (e.g., women, youth, elders).</p>	<p>Include more data of the regional and local areas.</p> <p>To take into consideration a GBA Plus approach.</p>

		Error: pg.19.10 “will provide approximately 450 fulltime employment opportunities” versus pg. 15.5 stated temporary employment for 450 employees.		
WAGE-03	GBA Plus	<p><b>Section 15.2.1 Gender-based Analysis Plus</b> requires further clarity. First, terminology in this section and elsewhere throughout the IPD uses the words “Women+” and “Men+” it is not clear what this means. If this terminology is used to align with <a href="#">2021 census collection</a> then this should be included in a footnote or referenced elsewhere in the IPD for clarification.</p> <p>In addition, there is mention of SaskPower’s commitment to a culture of diversity and inclusion, and how the Project is in the vicinity of the Humboldt and Area Pride Network and Out Saskatoon (pg. 15.3). While this is important contextual information related to the culture of the area, this section does not provide an explanation of how GBA Plus will be considered for the Project.</p> <p><b>GBA Plus in IA:</b> GBA Plus is used to identify who is impacted by a project, and assess how people may experience impacts differently in order to improve project design and develop mitigation measures that address these differential impacts (Women and Gender Equality, 2021). GBA Plus considers many identity factors and how these intersect with context and lived experiences to impact how people experience projects. In this way, GBA Plus is an intersectional analysis. An intersectional analysis recognizes that identities cannot be separated from the systems of power and privilege, like racism, colonialism and discrimination (for more information on intersectionality see: Hankivsky 2014; Manning 2014; CRIAW 2021; CIHR 2021). For impact assessments led by the Impact Assessment Agency of Canada (the Agency), Review Panels, and proponents, GBA Plus should be integrated into all aspects of assessments: planning, impact statements, impact assessments, decision making, follow-up, compliance and enforcement.</p> <p>The “<a href="#">Plus</a>” in GBA Plus acknowledges that GBA Plus is not just about differences between biological (sexes) and socio-cultural (genders). We all have multiple characteristics that intersect and contribute to who we are. GBA Plus considers many other identity factors such as race, ethnicity, religion, age, and mental or physical disability, and how the interaction between these factors influences the way we might experience government policies and initiatives.</p> <p>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.</p> <p>Some key questions to consider as data and information are gathered at all stages of GBA Plus include, but are not limited to:</p> <ul style="list-style-type: none"> <li>- What disaggregated data is available to understand the various intersecting dimensions of the issue?</li> <li>- Am I prioritizing certain factors and/or data over others? If so why?</li> <li>- Who should be involved in gathering and analysing data?</li> <li>- 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?</li> <li>- 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?</li> <li>- Are there any gaps in data in identifying differences and inequalities?</li> </ul>	<p>In addition to a GBA Plus approach throughout the IPD (e.g., Section 15.3 Regional Economic Description), 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> <p>Note: Application of GBA Plus is required throughout the TISG. For example, mitigation as per TISG Section 7. Methodology.</p>	<p>To take into consideration a GBA Plus approach.</p> <p>From the results of the GBA Plus, to put in place mitigation measures that consider the differential impacts of various population groups.</p>

		<p>Additional information on GBA Plus and diversity analysis is available at the following:</p> <ul style="list-style-type: none"><li>▪ <a href="https://research-groups.usask.ca/reed/documents/CEAA%20Report.FINAL.%20Walker%20Reed%20Thiessen.%20Gender%20Diversity%20in%20IA.Feb%208%202019.pdf">https://research-groups.usask.ca/reed/documents/CEAA%20Report.FINAL.%20Walker%20Reed%20Thiessen.%20Gender%20Diversity%20in%20IA.Feb%208%202019.pdf</a></li><li>▪ <a href="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/gender-based-analysis.html</a></li><li>▪ <a href="https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/tool-assessing-quality-gba-plus-impact-statement.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</a></li></ul>		
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*Please insert additional rows as necessary.*

Table 2. Clarifications or additional information the Proponent could include in the Detailed Project Description or in the response to Summary of Issues

Comment ID	Relevant section of the Initial Project Description	Description of Issue, Concern or Uncertainty	Clarification or additional information	Plain language summary for inclusion in Summary of Issues
<p>Please identify comments by organization and comment number.</p> <p>e.g.: IAAC-01</p>	<p>If the comment is related to a specific section of the Initial Project Description, please provide a reference.</p> <p>You may also choose to copy the relevant text here.</p>	<p>Provide a description of the issue, concern or uncertainty the proponent could address in their detailed project description that would give confidence that the issue will be addressed and managed, or which could aid in tailoring the Guidelines</p>	<p>Provide recommended clarification or additional information to be included in the Detailed Project Description to address the issue, concern or uncertainty, for example</p> <ul style="list-style-type: none"> <li>• Clarifications to project description (e.g. components, activities, locations or alternatives);</li> <li>• Project design changes that could avoid effects;</li> <li>• Evidence that could be presented to demonstrate there is no effect pathway or that effects will be negligible;</li> <li>• Evidence that standard mitigations will address potential effects;</li> <li>• Commitments the proponent could make to respond to the issue, including the implementation of federal operational policies or guidance documents.</li> </ul>	<p>For issues to be included in the Summary of Issues, provide a concise, plain language synopsis of the issue and of the question or direction for the proponent.</p>
WAGE-01	Section 3. Public Engagement Summary	As per <b>WAGE-01 in Table 1</b> , the IPD acknowledges an inclusive approach to engagement and consultation. It is not clear how this inclusion has been/will be tracked throughout the lifecycle of the Project. There is no clear data of participants to support that an inclusive approach has been taken.	<p>For a complete GBA Plus, the impacts on the project components would need to expand beyond the impacts on Indigenous people and the rights of Indigenous peoples to also explore both local population groups and the workforce.</p> <p>From a GBA Plus perspective, it is important to look at the impacts from different social locations and intersections to ensure considerations for all effected population groups and not solely Indigenous populations.</p>	<p>Increase engagement monitoring.</p>
WAGE-02	<p>Section 15.2.1 Gender Based Analysis Plus</p> <p>Section 19.2.6 Human Environment</p>	<p>As per <b>WAGE-03 in Table 1</b>, a descriptor or clarification should be provided for the terminology “woman+” and “man+” included in the IPD.</p> <p>In addition, the above recommendation (WAGE-03 Table 1) asks the proponent to consider effects and mitigation measures and differential impacts as a result of the project. For example, <b>Section 19.9 Summary of Effects</b> states that “consultation with the public have not identified adverse effects of the Project on social, economic, or health of inhabitants...The Project is not expected to result in negative effects to vulnerable population groups or result in gender-based violence.”</p> <ul style="list-style-type: none"> <li>• However, the Project proposes a workforce of 450 people and the oil and gas industry is predominately male; how might this influx of people (local, regional, or otherwise) potentially affect the nearby communities?</li> <li>• 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</li> </ul>	<p>Descriptor suggestion: Please note that as per the 2021 Census, the terms “men+” and “women+” are being used. Given that the non-binary population is small, data aggregation to a two-category gender variable is sometimes necessary to protect the confidentiality of responses provided. In these cases, individuals in the category "non-binary persons" are distributed into the other two gender categories. The category "men+" includes men, as well as some non-binary persons. The category “women+” includes women, as well as some non-binary persons. Language is adjusted when specifically referencing non-binary population or overall 2SLGBTQI+ population. For more information on Statistics Canada's convention for publishing data on gender at two levels see: <a href="#">Filling the gaps: Information on gender in the 2021 Census</a>.</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 behaviour,</p>	<p>Consider the requirements of the TISG to include GBA Plus throughout Project lifecycle, engagement, consultation, mitigation, and to create baseline conditions.</p> <p>Inclusion of potential GBV risks.</p>

		<p>in IAAC's <a href="#">Analyzing Health, Social and Economic Effects under the Impact Assessment Act</a>).</p> <p>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>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>	
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Please insert additional rows as necessary.