

ATTACHMENT: May 18, 2023
Federal Authority Advice Record
Response due by June 16, 2023

Moraine Power Generation Project – Moraine Initiatives Ltd.
Agency File: 005860

Department/Agency	Employment and Social Development Canada (ESDC)
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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.

ESDC does not exercise powers, nor perform specific duties or functions related to the Project to enable it to proceed.

The ESDC Minister's powers, duties and functions extend to and include all matters relating to human resources and skills development in Canada or the social development of Canada over which Parliament has jurisdiction, and which are not by law assigned to any other Minister, department, board or agency of the Government of Canada.

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.

While ESDC is not engaging with Indigenous groups regarding specific projects, it can provide the IAAC with information about relevant programming to assist in responses to Indigenous nations and members of the public.

ESDC also offers a suite of programming to promote an efficient and inclusive labour market that includes the following:

Indigenous Skills and Employment Training (ISET) Program

- 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.
- 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. Service delivery organizations are responsible for retaining client information such as: number of skilled workers, training history, and education (Certificates/Diplomas) and Apprenticeships.

Skills and Partnership Fund

- The Skills and Partnership Fund (SPF) is a demand-driven, project-based program that encourages stakeholders, such as training institutions, community organizations, local business and industry, to partner with Indigenous organizations to support skills development, job training and employment supports for Indigenous people. These partnerships are intended to better meet local labour market demands.
- Under SPF, Indigenous service providers design and implement projects to meet their partners' specific employment goals, with the objective of employment and increased integration in the labour market. This includes the testing of innovative approaches to providing labour market training and improving employment outcomes for Indigenous people.

Other ESDC programs and services can be found [here](#).

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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?

Specify the specialist or expert information or knowledge.

As a federal authority, ESDC provides advice on: social development; learning, skills development, employment, unemployment, underrepresented groups, and; working conditions and workplace relations, including relevant programming with respect to Indigenous Peoples.

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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?

Specify.

No.

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)

Provide an overview of the information or advice exchanged.

No.

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)?

Specify as appropriate.

No.

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.

Below are some examples of subject areas that ESDC would focus on in its review of the Project (to be developed at subsequent stages of the Project documentation):

- **Community profiles with the following socio-economic information relevant to ESDC's mandate:**
 - The current socio-demographic characteristics of the economic sector workforce of the project;
 - The labour force characteristics by age group and sex (if possible) 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; inclusion of a hiring strategy and any efforts made towards promoting an inclusive labour market;
 - The anticipated number of jobs created, how they will be added over the project's lifespan, jobs created in Canada vs. other countries, the type of skills and knowledge that could be required to support the completion of the project; how the project's budget will

be spent in the local region and the province and how it would benefit the local area;

- The main economic activities in the study area;
- Accessibility to programming similar to the following: Indigenous Skills and Employment Training Program (ISET), and Skills and Partnership Fund(SSWP);
- Employment barriers to participation for local under-represented groups such as visible minorities, indigenous person, people from a lower socioeconomic status, persons with disabilities, and GBA+ groups;
- Availability, affordability and appropriateness of child care as part of the measurement of the change in infrastructure in services; and
- Baseline conditions and projected impacts, for example, as outlined in the Tailored Impact Statement Guidelines (TISG) template.

- **Information regarding both local and other relevant labour markets. This includes initial labour market conditions and the anticipated impacts of the Project on the labour market, including:**
 - training and hiring strategies, including the intent to support diversity and inclusion throughout them;
 - effects to employment and how any adverse effects to employment would be managed, or mitigated;
 - applying a gender-based analysis plus (GBA+) lens in considering the effects to employment (e.g., consideration of underrepresented groups).
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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

- **It is recommended that engagement take place with the existing ESDC programming, for example, ISET service delivery network, occur to ensure that the existing federal training network is utilized.**
 - **It is encouraged for the proponent to make a clear and early attempt at applying GBA+ throughout their analysis. In situations where it may not be feasible to provide all the necessary information, particularly in the initial stages of the project, we request that the proponent clarifies their intentions to implement GBA+. This can be achieved by specifying the information they intend to include in the future, aiming to minimize the volume of comments due to missing details.**
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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"> • Clarifications to project description (e.g. components, activities, locations or alternatives); • Project design changes that could avoid effects; • Evidence that could be presented to demonstrate there is no effect pathway or that effects will be negligible; • Evidence that standard mitigations will address potential effects; • Commitments the proponent could make to respond to the issue, including the implementation of federal operational policies or guidance documents. 	<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>
<p>ESDC-1</p>	<p>Section 4.2: Engagement with Public and Other Stakeholders</p>	<p>The proponent indicates that an Engagement Plan is currently under development and that further discussions/communication or meetings with Indigenous groups in the first quarter of 2023 inviting participation in engagement activities to seek input on the Initial Project Description, Detailed Project Description.</p> <p>The proponent has identified 32 Indigenous groups to be engaged and consulted throughout the Project. To date the proponent has engaged with 14 Indigenous communities</p> <p>It is recommended that they also engage with the Indigenous Skills and Employment Training (ISET) Program First Nations and Métis service delivery providers regarding the project.</p>	<p>It is strongly recommended that the Proponent engage with the Indigenous Skills and Employment Training First Nations and Métis service delivery providers throughout the project, sharing the scope and details pertaining to the Project activities (e.g., type and number of jobs, timelines, and any other relevant information) with ISET agreement holders, so that training partners can work to prepare their clients to be ready to access these jobs.</p> <p><u>Indigenous Skills and Employment Training (ISET) Program</u></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</p>	<p>It is recommended that within section 4.2- Engagement with Public and Other Stakeholders:</p> <p>The proponent add plans to engage with employment and training organizations (e.g. ISET and AH who serve Indigenous People so that the scope and details pertaining to the project activities, such as type and number of jobs, timelines, and any other relevant information, be shared with the surrounding Indigenous communities, First Nations and Métis ISET agreement holders, 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 agreement holders 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.</p>

			<p>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 Alberta, there are currently 20 Indigenous service delivery organizations (18 First Nations and 2 Métis 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 Alberta: Get the skills and training you need by finding your local Indigenous service delivery organization - Canada.ca</p> <p>It is recommended that engagement with the local and broader ISET service delivery network occur to ensure that existing Federal training network is utilized.</p> <p><u>Skills and Partnership Fund</u> In addition, complimentary to the ISET Program, the Skills and Partnership Fund (SPF) is a project-based program that funds partnerships between Indigenous organizations and industry employers to provide skills training for Indigenous peoples linked to economic opportunities at the local, regional and national level. By increasing access to training that is demand-driven, the SPF plays a key role in directly linking Indigenous peoples to specific jobs and improving their employment outcomes.</p>	
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ESDC-2	Section 9.3: Description of Project Activities	There is no information regarding hiring practices and workforce conditions in the description of the project's construction, operation, and decommissioning.	<p>What will be the wage rate of the staff that will be employed under the third-party operator?</p> <p>What will be the employment status of the staff (part or full time, temporary or permanent)?</p> <p>Are the staff likely to have a previous affiliation with Moraine Initiatives Limited or with a parent company? If yes, was this workforce unionized?</p> <p>Is the workforce of the third-party operator unionized?</p>	More information is needed regarding worker wages and labour conditions to better understand the hiring process and its outcome on the surrounding communities.
ESDC-3	Section 15.0: Health, Social and Economics of Woodlands County and the Town of Whitecourt	The Initial Project Description (IPD) states that the construction work force for the Project is estimated at 600-700 persons over a 3-year period and that construction workers are expected to be from the area, working from Whitecourt, the Alexis Nakota Sioux Nation, or surrounding communities.	It would be helpful to understand if there are any contractual commitments or obligations to hire workers locally, including from nearby Indigenous communities such as Alexis Nakota Sioux Nation	Include detailed plans regarding contractual obligations to hire locally, especially within local Indigenous communities.
ESDC-4	Section 15.0: Health, Social and Economics of Woodlands County and the Town of Whitecourt	One reads on page 62 that "the age composition of the County shows the largest proportion being two-person households followed by households with three or more residing in one dwelling." The age composition and the number of persons per household are entirely separate statistics. This sentence thus provides no information regarding the age distribution in the county.	Describe the age distribution of the county's population.	More data should be provided concerning the age of persons in Woodland County. This would help to calculate the workforce available to help with the project.
ESDC-5	Section 15.0: Health, Social and Economics of Woodlands County and the Town of Whitecourt	The description of the age distribution of Whitecourt, which is found in the last paragraph on page 62, should be more disaggregated and give absolute numbers as well as percentages.	Instead of reading that 68.6% of the people are between the ages of 15 and 64, one should see that xx number of people, constituting xx% of the population, are aged 15-24, 25-54, and 55-64.	The provision of more disaggregated data on age groups and numbers in addition to percentages would help to calculate the workforce available to help with the project.
ESDC-6	Section 15.0: Health, Social and Economics of Woodlands County and the Town of Whitecourt	What is the proportion of women and men in Whitecourt and Woodlands County?	Indicate the proportion of men and women in the region by the age groups above.	Data on the proportion of men and women in the region would help to determine the availability of labour for this project. These statistics are especially important for

				construction projects such as this power plant, given that the large majority of construction workers are men.
ESDC-7	Section 15.0: Health, Social and Economics of Woodlands County and the Town of Whitecourt	It is not stated in the description how the employment and unemployment rates in Whitecourt and Woodlands County compare with the same rates for the province and the country.	Add the employment and unemployment rates for Alberta and Canada.	The addition of the employment and unemployment rates for Alberta and Canada would provide some context concerning the strength of the local economy.
ESDC-8	Section 15.0: Health, Social and Economics of Woodlands County and the Town of Whitecourt	Do Filipino-Canadians constitute 66.6% of the total population of Whitecourt (p. 63)? This seems very high. Perhaps there is a typo here and 6.66% is the correct percentage? Are the persons Filipino Canadian citizens, permanent residents, or temporary foreign workers?	If the correct percentage is 66.6%, add a sentence or two to explain why the proportion is this high, and note if a large proportion of them are temporary foreign workers.	It is not clear what percentage of the population consists of Filipino-Canadians, nor if they are Canadian citizens/ permanent residents or temporary foreign workers.
ESDC-9	Section 15.0: Health, Social and Economics of Woodlands County and the Town of Whitecourt	The educational attainment and occupations of persons in Woodland County and Whitecourt need to be better described.	Describe the educational attainment and occupations of persons in the region surrounding the project.	Data concerning the skills and occupations of the local workforce would help to determine their suitability for work on the project.
ESDC-10	Section 15.0: Health, Social and Economics of Woodlands County and the Town of Whitecourt	The project description would benefit from a more fulsome description of the local economy.	Provide more details concerning the local economy. What, for example, are the largest industries and employers (for the entire region, and not just for Whitecourt)?	More information with respect to the local economy would help to ascertain whether the local workforce would suffice for the construction and operation of the power plant.
ESDC-11	Section 22.0: Potential Effects on Indigenous Health, Social, and Economic Conditions	MIL is developing an Engagement Plan, discussed in Section 4.2, that includes identifying and participating in meaningful processes to promote economic prosperity for the Indigenous groups. Socioeconomic effects are anticipated to be positive for Indigenous groups due to opportunities for employment during construction and operations of the PGF.	When submitting the Detailed Project Description (DPD), the Proponent should include specific details about how the project will guarantee that local Indigenous people are hired as workers for the project and how the details regarding how socio-economic benefits from the project will be passed along to local Indigenous communities. Are there other vulnerable groups that will be prioritized in hiring (i.e. women, visible minorities, persons with disabilities)? If so, what will the strategy(ies) be to increase hiring diversity.	Provide specific strategies to increase hiring of Indigenous communities as well as other vulnerable groups (women, visible minorities and persons with disabilities).
ESDC-12	Section 22.0: Potential Effects on Indigenous Health, Social, and Economic Conditions	A separate section for the potential economic impacts of the power plant is needed to properly examine this issue. This section also needs to be significantly expanded, as it currently lacks much important information. Items to be added are found below.		
ESDC-13	Section 22.0: Potential Effects on Indigenous	There is little information concerning the type of jobs that would be needed to build and operate the power	Please list the occupations that would be required for the construction and operation of	Determining whether the local population can supply the labour and skills needed to

	Health, Social, and Economic Conditions	plant, nor of their education or training requirements. It is also not clear if these skills are present in sufficient numbers in the local population.	the power plant, their education and training requirements, and the approximate number of workers that would be needed in each occupation. Also indicate whether these skills can be provided in sufficient numbers by local workers.	build the plant is an essential part of the impact assessment. If local labour does not suffice, then workers will have to be brought in from elsewhere.
ESDC-14	Section 22.0: Potential Effects on Indigenous Health, Social, and Economic Conditions	There is little information concerning the quality of the jobs that would be created.	State approximately what employee wages, benefits, and working conditions would be, and how they would compare to provincial, national, and industry averages.	The initial project description contains few details on the quality of the jobs that would be created, even though this is an important consideration.
ESDC-15	Section 22.0: Potential Effects on Indigenous Health, Social, and Economic Conditions	It is not entirely clear how the power plant would benefit the local economy.	Provide details on how much of the project's budget would be spent locally, both on salaries and on procurement, and thus benefit the local economy.	More information on how project spending would benefit the local economy is necessary to evaluate its economic impact.
ESDC-16	Section 22.0: Potential Effects on Indigenous Health, Social, and Economic Conditions	What training will the proponent provide?	Note what employer-sponsored training will be provided, if this is necessary.	Details concerning employer-sponsored training would help to evaluate the project's impact on the local workforce.
ESDC-17	Section 22.0: Potential Effects on Indigenous Health, Social, and Economic Conditions	More details are needed with respect to the project's impacts on groups that are underrepresented in the labour market (Indigenous persons, women, youth, recent immigrants, etc.), including efforts to recruit and train their members.	State what efforts would be made to benefit groups that are underrepresented in the labour market, such as training and recruiting that is targeted to them.	Given that improving the employment outcomes of groups that are underrepresented in the labour market is a priority for the Government of Canada, more information on how the project would accomplish this would help to evaluate it.
ESDC-18	Section 22.0: Potential Effects on Indigenous Health, Social, and Economic Conditions	What would happen to laid-off employees?	Note what assistance will be provided to workers who will be laid off once the power plant reaches the end of its life cycle. Layoffs could also occur earlier if economic conditions deteriorate or alternative sources of energy, such as renewables, become more widely used and replace natural gas. Assistance to workers could be in the form of early retirement packages, severance pay, training, or an offer of employment elsewhere.	The treatment of laid-off employees is a consideration with respect to the economic impacts of the project.
ESDC-19	Section 22.0: Potential Effects on Indigenous Health, Social, and Economic Conditions	The proponent has indicated that socio-economic effects are anticipated to be positive for Indigenous groups due to opportunities for employment during construction and operations of the project. Opportunities for socio-economic effects will be further evaluated in the engagement activities to seek	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.	The proponent should indicate the specific steps they will take to encourage the employment and training of Indigenous peoples to achieve the indicated positive socio-economic effects.

		<p>input on the Initial Project Description, Detailed Project Description (DPD) based on engagement with Indigenous groups, as outlined in Section 4. The Project construction phase will take place over three years and the workforce is estimated to be 1, 500. The operating stage (40 years) of the project the workforce is estimated to be 1,280.</p>	<p>It is strongly recommended that the Proponent explicitly identify whether Indigenous individuals and businesses will receive prioritized employment opportunities.</p> <p>Refer to comment ESDC-1 for examples of Indigenous skills and development programs.</p>	
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Please insert additional rows as necessary.