

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	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.

- 1.a) WAGE does not hold any regulatory power, functions or duties.
1.b) N/A

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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.

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

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.

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.

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)?

Additional information on GBA Plus is available at below links and an **Overview of Gender-based Analysis Plus (GBA Plus)** has been added on pages 8-10 for your awareness.

IAAC:

- [Guidance: Gender-based Analysis Plus in Impact Assessment - Canada.ca](#)
- <https://research-groups.usask.ca/reed/documents/CEAA%20Report.FINAL.%20Walker%20Reed%20hiessen.%20Gender%20Diversity%20in%20IA.Feb%208%202019.pdf>
- [Other research related to GBA Plus – See sections “Knowledge Synthesis Grants – Informing Best Practices in Environmental and Impact Assessments” and “Targeted Research”: Impact Assessment Agency of Canada Research Program - Canada.ca](#)

WAGE:

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

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

Name of
Departmental /
Agency Responder

Title of Responder

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><i>Please identify comments by organization and comment number.</i></p> <p><i>e.g.: IAAC-01</i></p>	<p><i>Identify valued component(s) or factor to consider—within the mandate of your department or agency—to which the effect or issue applies.</i></p>	<p><i>Provide a brief description of the issue and rationale for being a key issue.</i></p> <p><i>Include, where relevant,:</i></p> <ul style="list-style-type: none"> • <i>the pathway of effects;</i> • <i>social, economic or environmental context which are relevant to it being a key issue;</i> • <i>key uncertainties that should be addressed in the impact assessment;</i> • <i>Indigenous or public concerns or perspective;</i> • <i>potential for differential effects among diverse subgroups;</i> • <i>scientific evidence or traditional knowledge, including from past project experience, which supports inclusion as a key issue.</i> 	<p><i>Where applicable, briefly identify solutions to address the potential issue or effects including</i></p> <ul style="list-style-type: none"> • <i>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;</i> • <i>Any powers, duties or functions that your department or agency has that may mitigate, manage, or set conditions related to the effect;</i> • <i>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</i> • <i>Commitments the proponent could make to respond to the issue.</i> <p><i>Where available, please refer to existing text in the TISG template.</i></p>	<p><i>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.</i></p>
WAGE-01	Social Conditions and engagement	<p>Section 4 Engagement with Indigenous Groups, Public, Other Stakeholders identifies that the Proponent has sent 32 introductory letters to Indigenous groups and received 14 responses. These 14 groups were then engaged with by email, phone calls, and meetings (pg. 5). Under Table 4.3, further detail is included on key issues, concerns (ranging from employment to species risk) and the response from the Proponent. (pgs. 11-16)</p> <p>However, it is not clear with whom discussions have been made to inform the positive and negative health, social and economic impacts on various population groups, including Indigenous divers’ population groups. For example, how many people attended open houses, has there been specific engagement session to obtain the point of view of various population groups, who are being invited to face-to-face meetings?</p>	<p>Where possible include data of those consulted and engaged.</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>	To increase engagement and monitoring.

		<p>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?”. This consultation should be inclusive and accessible as the Project is within the traditional lands of 32 Indigenous groups, with the Alexis Whitecourt reserve is the closest reserve to the Project, approximately 1km north of the site (pg. 109).</p> <p>The IPD makes a commitment to continue to engage community members and identified Indigenous groups. 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, 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 Tool – Assessing the Quality of a GBA Plus in the Impact Statement</p>	<p>Should an Impact Assessment be required, note that as per Section 6.2 Record of Engagement of the TISG template, usually the following is required:</p> <p>“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 harvesters) to support the collection of information needed to complete the GBA+”; and “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).”</p>	
WAGE-02	Economic conditions (Employment)	<p>The IPD states that “Gender based minorities are not listed for Whitecourt” but there is also no basic disaggregation by sex for Whitecourt or Woodlands County. It is not clear what proportion of either County or within the local workforce identify by women and men (pg. 63). In addition, Table 15.1 Health-related Indicators, Whitecourt offers social determinants of health indicators in Whitecourt and Alberta but again, this data is not disaggregated further.</p> <p>Regarding employment, Section 7.3 Project Benefits states that the construction stage (3 years) will employ 1,500 person-years of employment (estimated at 600-700 persons (pg. 65)) and the operating stage (40 years) will employ 1,280 person-year of employment (estimated at 32 persons (pg. 65) (pg.23). Construction camps will not be required.</p> <p>Section 15 Health, Social, and Economics of Woodlands County and the Town of Whitecourt: provides an overview of the Project region. Regarding employment, the IPD states that 15% of the labour force of the region are employed in mining, the largest group by industry and construction workers are expected to be from the area, working from Whitecourt, the Alexis Nakota Sioux Nation, or surrounding communities; construction camps will not be required.” (pg. 62, 65).</p> <p>However, with the information provided it is not quite clear how the recruitment and hiring process will have a broad representation or recruit people from the local communities. There is some data related to income, racialized persons, and Indigenous identity. The IPD mentions that “gender-based minorities are not list for Whitecourt” but there is no inclusion of basic disaggregated data by sex or gender (pg. 63). Without a further breakdown of this data, it can be difficult to answer questions to help establish a baseline of social, economic, and health conditions such as: what is the employment/unemployment rate for women? Will the Proponent be seeking to recruit women and others</p>	<p>Should an Impact Assessment be required, note that as per the TISG template Section 11. Baseline Conditions – Economic, it will be required 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 template 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>

		<p>who are often underrepresented in the oil and gas industry (see: Employment characteristics for the oil and gas sector (statcan.gc.ca))? What is the age range or education level for the 15% currently employed in the mining industry in the region? (See also: Proportion of men and women employed in various occupations StatCan)</p>		
WAGE-03	Gender-based Analysis Plus (GBA Plus)	<p>There is currently minimal inclusion of GBA Plus in the IPD.</p> <p>There are some important links to additional information on GBA Plus and Impact Assessment included in our response under question 5 and below Table 2.</p>	<p>Beyond the inclusion of a minimal GBA Plus approach in the IPD (e.g., Section 15), WAGE recommends that effects and mitigations measures also be considered based on the results of 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: IAAC's GBA Plus Guidance)</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>

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"> • 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>
WAGE-01	Section 4 Engagement with Indigenous Groups, Public, Other Stakeholders	As per WAGE-01 in Table 1 , it is not clear how this engagement has been/will be inclusive or accessible to interested community members nor is it apparent how participation has been/will be tracked throughout the lifecycle of the Project. Disaggregation of participant data would be helpful to collect (e.g., age, sex, location, occupation).	<p>For a complete GBA Plus, it is essential that impacts on the project components assess the impact of Indigenous people and their rights, but to be complete, it also needs to be assessed in a disaggregated manner and the same, impacts for local population groups and workforce should be explored.</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>	Increase engagement monitoring.
WAGE-02	All sections	<p>As per WAGE-03 in Table 1, WAGE asks the proponent to consider effects/consequences of direct and incidental activities to better tailor the mitigation measures of the project. For example, Section 3.9 and Section 5.3 Potential Effects to Indigenous Peoples provide brief overviews of context and potential conditions but there remain several important questions that have not yet been considered:</p> <ul style="list-style-type: none"> • The Project proposes a construction and operational workforce, and as those in the oil and gas industry are predominately male, and a potential challenge is recruitment/interest of local workers, how might an influx of people (local, regional, or otherwise) potentially affect the nearby communities, temporary or otherwise? • Although the IPD states that “a review of the potential effects on Indigenous health has not yet been evaluated” (pg. 107). WAGE recommends reviewing the health dimensions to include both biophysical and social health components. This could include health behaviours (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) 	<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, and to maintaining open dialogue and regular communication, including robust workplace education and sensitivity training. Enforcement must include real consequences for harassing or violent behaviour. (Source: IAAC’s GBA Plus Guidance).</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>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 Analyzing Health, Social and Economic Effects under the Impact Assessment Act).</p> <p>Other indicators should be taken into consideration such as:</p> <ul style="list-style-type: none"> ▪ Health indicator: sexually transmitted infections, unwanted pregnancies/abortion, adolescent birth rate (WAGE's GBV page: Infographic: GBV Overview; and WAGE's GRF page: Gender Results Framework (GRF)). ▪ Even if a construction camps will not be required, Gender-based Violence should be included under the Health and Safety considerations of the Project within the IPD. 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: What is gender-based violence?). For example: Table 9.3 states that a multi-purpose building will be constructed to house the operating and maintenance staff (pg. 32). With the construction a site access road (pg. 33) human trafficking may also be of concern (source: National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019). 		
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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.