

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

Great Bear Gold Project

Response required by: June 7, 2024

All comments should be submitted via the Submit a Comment feature available on the Project’s Canadian Impact Assessment Registry page (<https://iaac-aeic.gc.ca/050/evaluations/proj/85832?culture=en-CA>). Documents can be uploaded using this feature. If you have any difficulties submitting this way, please contact the Registry directly at registry-registre@iaac-aeic.gc.ca. All comments submitted using this form will be posted on the Registry website for the Project.

Please note that this is your opportunity to customize the draft Tailored Impact Statement Guidelines.

Department/Agency:	Women and Gender Equality Canada		
IA Contact:	Denise Gareau, Director, GBA Plus Directorate, Research Results & Delivery and Center of Expertise Branch	Telephone:	819-938-1132
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Section 1 – Draft Permitting Plan:

1. Confirm that all applicable legislative and regulatory oversight that may apply to the Project, under the authority of your department or agency, is accurately listed in the draft Permitting Plan.

Insert response here:

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

Based on the project’s potential effects relating to women and the advancement of gender equality, the following are potential effects within federal jurisdiction on which WAGE focus:

- Section 2 of the *Impact Assessment Act*:
 - (c) With respect to the Indigenous people of Canada, an impact on: (i) physical and cultural heritage
 - (d) Any change occurring in Canada to the health, social or economic conditions of the Indigenous peoples of Canada
 - (e) Any change to a health, social or economic matter that is within the legislative authority of Parliament that is set out in Schedule 3.

- Indicate whether your department or agency has identified any power that it will be unable to exercise to allow the Project to proceed, in whole or in part. For more information, please refer to subsection 17(1) of the IAA.

Insert response here:

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

Section 2 – Draft Tailored Impact Statement Guidelines:

- Please review the draft Tailored Impact Statement Guidelines (the Guidelines) sections that are applicable to your department’s or agency’s mandate.
- Using the table below, given the context of the Project, please provide any comments and include your recommendation for how the final Tailored Impact Statement Guidelines should be adapted to address any comments.
 - Please indicate any corrections, additions or deletions that should be made to the text. Please provide a clear context and rationale for your recommendations.
 - Federal expert advice should be commensurate to the situational context of the Project and informed by risk-based prudence and evidence in the proponent’s Detailed Project Description¹ and Response to the Summary of Issues², with a strong reliance on well-understood mitigation measures, existing guidance, and regulatory instruments that will manage effects.

Department – Comment ID (e.g., ECCC-01)	Draft Guidelines Section	Context and Rationale (provide an explanation of your comments)	Recommendation: provide text to be inserted or deleted. Be specific on the location within the draft Guidelines that the text would be added/deleted.
WAGE-01	Abbreviations and Short Forms p. v	Gender-based violence (GBV) should be included in the list of abbreviations and short forms.	Add “Gender-based violence (GBV)” to the list.
WAGE-02	1.2 Gender-based Analysis Plus (GBA Plus) p. 3	The definition of GBA Plus should be updated to reflect the most-current GBA Plus definition posted on WAGE’s GBA Plus webpage . Recommend the use of the term “various population groups” instead of “subgroups” in the	GBA Plus is an analytical process that can guide practitioners to identify who is impacted by a project and assess how they may experience impacts differently, in order to develop mitigation measures to address these differential impacts. These Guidelines refer to “diverse

¹ <https://iaac-aeic.gc.ca/050/evaluations/document/155992>

² <https://iaac-aeic.gc.ca/050/evaluations/document/153313>

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		<p>TISG as used by Statistics Canada “Population group of person”.</p> <p>Recommend specifying that for to met IAAC’s expectations, the GBA Plus must consider various identity factors, as well as their intersection.</p>	<p>subgroups“ in the context of GBA Plus, in reference to groups within the general population and within communities (e.g. by sex, gender, age, ethnicity, indigeneity, socioeconomic status, health status and any other community-relevant identify factors) tool used to support the development of responsive and inclusive policies, programs, and other initiatives. GBA Plus is a process for understanding who is impacted by the issue or opportunity 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 an intersectional analysis that goes beyond biological (sex) and socio-cultural (gender) differences to consider other factors, such as age, disability, education, ethnicity, economic status, geography (including rurality), language, race, religion, and sexual orientation. Using GBA Plus involves taking a gender- and diversity-sensitive approach to our work. Considering all intersecting identity factors as part of GBA Plus, not only sex and gender, is a Government of Canada commitment.</p> <p>These Guidelines refer to “diverse population groups” in the context of GBA Plus. That is, taking into account various identity factors</p>

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			(e.g. sex, gender, age, ethnicity, Indigenous identity, socio-economic status, health status and any other community-relevant identity factors) and their intersection(e.g., Indigenous women and racialization, young men recently immigrated to a rural area) with consideration of context, lived experience and structural barriers that intersect with one another and may impact how people may be impacted by the Project. The Agency’s Guidance Gender-Based Analysis Plus in Impact Assessment ⁵ provides guiding principles and tools to apply GBA Plus in the Impact Statement.
WAGE-03	1.2 Gender-based Analysis Plus (GBA Plus) p. 3	See comment WAGE-02	To support GBA Plus, information provided in the Impact Statement must: <ul style="list-style-type: none"> • be sufficiently disaggregated to support the analysis of disproportionate effects as per GBA Plus’s intersectional approach. Where As much as possible, the data must be disaggregated by identity factors (e.g., by sex, gender, age, ethnicity, Indigenous identity Indigeneity, ability, and any other community-relevant identify factors) and by cross-identity factors (intersectional approach) and be presented distinctly for each population groups specific subgroup;

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WAGE-04	1.2 Gender-based Analysis Plus (GBA Plus) p. 3	GBA Plus is not limited to gender/sex-sensitive data as the “Plus” in GBA Plus acknowledges that the analysis goes beyond biological (sex) and socio-cultural (gender) differences. We have multiple identity factors that intersect to make us who we are; GBA Plus also considers many other identity factors like racialization, ethnicity, religion, age and mental or physical disability to name a few (see IAAC’s GBA Plus Guidance).	Quantitative information, including equality, diversity and inclusion gender sensitive data (e.g. gender-based violence, economic participation and prosperity, discrimination or unfair treatment, and any other data relevant to the community), should be complemented by qualitative insights from studies, engagement and/or consultations, and other sources
WAGE-05	3.4 Project components and activities p. 9	<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>As per IAAC’s TISG Template, the usual language is “describe the project components, associated and ancillary works, and other characteristics to assist in understanding the potential environmental, health, social and economic effects, and impacts on Indigenous peoples and rights of Indigenous peoples. [...]”, That said, should specification of</p>	<p>The Impact Statement must:</p> <ul style="list-style-type: none"> describe the project components, associated and ancillary works, and other characteristics to assist in understanding the potential environmental, health, social, and economic effects, and impacts on all people in Canada, including Indigenous peoples and their rights

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		<p>who’s effects need to be specified, as per Section 2 of the IAAC, changes to the health, social or economic conditions of Indigenous People is to be assessed as it pertains under federal jurisdiction. In addition, based on Section 63 outlining the public interest factors, sustainability, which includes the social and economic well-being and health of all Canadians (including Indigenous), for present and future generations must be taken into account.</p> <p>Note: As per below requirements, WAGE recommends that social effects such as gender-based violence be assess for near Indigenous communities, and also within the mining workforce (immigrants, Indigenous, racialized women and all others). This issue must be addressed to ensure future diverse generations can be safe working in the mining industry. In addition, discrimination against various population groups must be addressed to ensure that future generation are welcome and have the same employment opportunities in this field. (Source: Safe Workplaces for All – Addressing Sexual Harassment in Canadian Mining)</p>	
WAGE-06	3.4 Project components and activities p. 10	Recommend the use of the term "various population groups" instead of “subgroups” in the	<ul style="list-style-type: none"> detail how input from diverse and various population groups subgroups was used to identify potential components or activities of concern;

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		TISG as used by Statistics Canada " Population group of person ".	
WAGE-07	3.5 Workforce requirements p. 13	Recommend the use of the term "various population groups" instead of "subgroups" in the TISG as used by Statistics Canada " Population group of person ".	The information must be presented in sufficient detail to analyze how historically excluded or underrepresented groups will be taken into account, including Indigenous communities and other relevant diverse subgroups various population groups .
WAGE-08	5.1 Summary of public engagement activities. p. 18	For the third bullet point in this section, replace "subgroups" with "population groups".	...methods used, where consultations were held, the persons, organizations and diverse subgroups and various population groups consulted;
WAGE-09	5.2 Analysis and response to questions, comments and issues raised p. 18	Being consistent with the comments above, "subgroups" should be replaced with "population groups" for the first bullet point of the section.	provide a summary of key issues related to the Project, including the potential environmental, health, social and economic effects and potential for disproportionate effects for diverse subgroups within the population and various population groups subgroups within the population , which were raised through engagement with the public, or how they were incorporated into the Impact Statement;
WAGE-10	7.1 Baseline methodology p.26-27	Being consistent with the comments above, "subgroups" should be replaced with "population groups".	Ethical guidelines and relevant cultural protocols governing research, data collection and confidentiality must be adhered to. This is particularly important in the case of information gathered and studies conducted with vulnerable subgroups (e.g. analysis of gender-based violence (GBV)).

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WAGE-11	7.1 Baseline methodology p.27	Being consistent with the comments above, “subgroups” should be replaced with “population groups”.	describe how GBA Plus was applied to examine differences in baseline conditions among diverse subgroups population groups and provide disaggregated data where necessary;
WAGE-12	9.2 Effects on human health p.87	Being consistent with the comments above, “subgroups” should be replaced with “population groups”.	<ul style="list-style-type: none"> • apply GBA Plus across all health effects and document how potential effects or changes to human health conditions could be different for diverse subgroups and various population groups.
WAGE-13	9.2.2 Social determinants of health p. 90	The safety of Indigenous women is a very important issue, but it is not limited to this population group. Suggests being more general without excluding "Indigenous women".	<ul style="list-style-type: none"> • safety of various population groups, including Indigenous women;
WAGE-14	9.3 Mitigation and enhancement measures p. 91	<p>As stated in the IAAC’s GBA Plus Guidance: “Transient, male-dominated workforces can have adverse social impacts in communities, particularly for young and Indigenous women. The interrelationships between sexism, racism and colonialism shape these impacts (National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019). Robust workplace education and sensitivity training, as well as strict enforcement of harassment, alcohol and drug policies, may be required. Enforcement must include real consequences for harassing or violent behaviour.”</p> <p>Also, see “note” from WAGE-05 context and rationale.</p>	<ul style="list-style-type: none"> • identify robust workplace education and sensitivity training, as well as strict enforcement of harassment, alcohol, and drug policies.

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WAGE-15	10.1 Baseline conditions (p. 92)	Being consistent with the comments above, “subgroups” should be replaced with “population groups”.	<ul style="list-style-type: none"> describe how Indigenous Knowledge was used in establishing baseline conditions, including input from diverse and various population groups subgroups within Indigenous communities; and describe baseline conditions using disaggregated data for diverse and various population groups subgroups (e.g. women, youth and Elders) and their different access to resources, opportunities, and services within the community to support GBA Plus.
WAGE-16	10.2.1 Effects to community well-being p. 94	Being consistent with the comments above, “subgroups” should be replaced with “population groups”.	<ul style="list-style-type: none"> apply GBA Plus within the information related to community well-being for Indigenous Peoples and document how potential effects of changes to community well-being could be different for diverse and various population groups subgroups (e.g. women, youth, or Elders).
WAGE-17	11.1 Baseline conditions p. 97	Being consistent with the comments above, “subgroups” should be replaced with “population groups”.	Baseline conditions must be described using disaggregated data for diverse-subgroups and various population groups (e.g. Indigenous women, youth, and Elders) and their different access to resources, opportunities and services within the community to support GBA Plus.
WAGE-18	11.2 Mitigation and	Being consistent with the comments above, “subgroups” should be replaced with “population groups”.	Specify the types of employment targeted by these programs, as well as the targeted clientele, such as Indigenous Peoples, and

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	enhancement measures p. 100		various relevant subgroups population groups (e.g., Indigenous women);
WAGE-19	12.3.2 Effects to Indigenous health, social, and economic conditions p. 108	Being consistent with the comments above, “subgroups” should be replaced with “population groups”.	For example, an effect on a traditional food or medicinal plants may have consequences for the practice of traditional activities, and could lead to an effect on food security at the community level or on vulnerable subgroups population groups .
WAGE-20	12.4.1 Baseline conditions p. 110	Since both women and men were listed in this example, we recommend mentioning two-spirited people so that the gender listing is not just binary. There is acknowledgement elsewhere in the draft TISG, but not in this section. In addition, it may help to remember that this population group was identified in the final report of the National Inquiry into Missing and Murdered Indigenous Women and Girls under the section "Extractive and Resource Industries Appeals" (sections 13.1 to 13.5) Source: https://www.mmiwg-ffada.ca/wp-content/uploads/2019/06/Calls_for_Justice.pdf	<ul style="list-style-type: none"> where possible, information about members within an Indigenous community, and their role in the exercise of rights (e.g. women, men, two-spirited people, Elders, youth, people with disabilities).
WAGE-21	12.5 Mitigation and enhancement measures p. 112	Being consistent with the comments above, “subgroups” should be replaced with “population groups”.	<ul style="list-style-type: none"> propose differentiated mitigation measures, if applicable, so that adverse effects do not fall disproportionately on Indigenous communities and vulnerable subgroups population groups, and they are not disadvantaged in sharing any positive effect resulting from

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			the Project. These mitigation measures should be developed in collaboration with the potentially affected communities and population groups subgroups ;

Insert as many rows as applicable