

ATTACHMENT: 2023-06-10

Federal Authority Advice Record (FAAR)

The FAAR must be submitted on the Registry by November 3, 2023.

Strange Lake Rare Earth Mining Project – Torngat Metals Ltd.

Registry reference # 85969

Department/Agency	Women and Gender Equality Canada
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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.

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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.

Additional information on GBA Plus and diversity analysis is available at below links and an **Overview of Gender-based Analysis Plus (GBA Plus)** has been added on pages 7-8 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%20Thiessen.%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;
- Provide advice on how to address 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)	Advice	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 provide advice on how 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>
<p>WAGE-01</p>	<p>General Editorial Comment – All sections</p>	<ol style="list-style-type: none"> 1. WAGE would like to note that "Gender-based Analysis Plus" acronym should be "GBA Plus" instead of "GBA+". The Plus is no longer a symbol, but rather spelled out to emphasize the intersectional approach of GBA Plus. 2. "Elders" are references throughout the IPD. WAGE would like to remind the proponent that the word "Elder" should be reserved when referring to Indigenous Elders and should always capitalize as a sign of respect and to distinguish between the term referring to a respected member of an Indigenous community. 3. The terminology for "older persons" in Canada is shifting to be more inclusive. In July 2022, the World Health Organization (WHO) opted to use the term "abuse of older people". Since then, civil society organizations, academia, and the Government of Canada increasingly refrain from using the terms "senior" and "elder". This is because: <ul style="list-style-type: none"> ▪ The definitions of "older" and "older life" varies for different people. 	<ol style="list-style-type: none"> 1. Please use the "GBA Plus" acronym in future documents. 2. Please use and capitalize "Elder" when referring to Indigenous Elders 3. Please use the term "older persons" instead of "senior" or "elders" when identifying this age population groups. 	<ol style="list-style-type: none"> 1. To use "GBA Plus" as acronym. 2. To use "Elders" when appropriate. 3. To use "older persons" when required.

		<ul style="list-style-type: none"> Emerging research does not use a consistent age range across studies (e.g., 50 years of age and older; typical retirement age, 65, and older). Variability exists in the health status, vulnerabilities, dependency, and life experiences of people who are older. 		
WAGE-02	<p>Section 15.3. Human Health, Quality of Life and Psychosocial Impacts (pgs. 168-169)</p> <p>Section 19.2.2.4 Social Environment (Pg. 228)</p> <p>Section 22 Anticipated changes and impacts on Indigenous communities – health, social, and economic conditions (pgs. 241-243).</p>	<p>Section 15.3 Human Health, Quality of Life and Psychosocial Impacts offers a brief health profile and individual characteristics of the different Indigenous and non-Indigenous communities that may be affected by the current project. In addition, Section 22, Table 22-1 does not include gender-based violence (GBV) as a potential risk throughout the lifecycle of the Project.</p> <p>Table 3-4: Preliminary list of groups and organisations by GBA+ stakeholders, per region lists at least four groups that handle victims of violence (Tungasuvvik Women’s Shelter, Autour d’Elle – Sept-Îles, Nukum Munik Shelter, and Violence Prevention Labrador), three of which focus on victims of domestic violence. In Section 15.3.1.1. Nunavik Inuit, the Proponent also states that “psychological distress is prevalent, especially among young people, as evidenced by high rates of alcohol and drug abuse, violence, and suicide.” (p.171) GBV is an existing issue in the communities in proximity to the Project site and the Project may increase this risk and should be captured under section 19.2.2.4 Social Environment.</p> <p>Existing research has highlighted the links between resource development projects and risks of gender-based violence and sexual harassment for Indigenous women, girls, and gender-diverse people (Amnesty International, 2016; National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019; Pauktuutit Inuit Women of Canada, 2021; The United Nations Declaration on the Rights of Indigenous Peoples Act, 2023). In addition, the World Health Organization considers violence against women a global health concern. Therefore, the GBV must be clearly identified as a Quality of life/human health condition.</p>	<p>WAGE recommends that gender-based violence be assessed communities in proximity to the Project, 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, as well as to dwell in communities located near the project site. 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.</p> <p>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>Other indicators should be taken into consideration such as: 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).</p> <p>Source: Safe Workplaces for All – Addressing Sexual Harassment in Canadian Mining. “[...] the sector continues to be recognized as relatively homogeneous, made up largely of people who identify as men. Many factors may contribute to this, including historical precedence, poor perceptions of the industry, the remote FIFO nature of many occupations, and lack of awareness of mining career opportunities and enrolment among diverse student communities in fields that lead to work in mining – such as engineering and the trades. Addressing systemic workplace barriers to inclusion such as sexual harassment and violence can support efforts to diversify the mining workforce.” (p.7)</p>	<p>From the results of the GBA Plus, to put in place mitigation measures that consider the differential impacts of various population groups and to support the safety and security of people, including ongoing measures to prevent gender-based violence (GBV).</p> <p>Inclusion of GBV risks throughout is recommended.</p>
WAGE-03	Section 9.8 Employment and Workforce, pg. 63.	<p>Although a precise estimate of the workforce is not available Section 9.8 Employment and Workforce notes that estimated contract labor force will likely peak at 1,000 workers (pg. 64)</p> <p>Section 9.8.3. Equity, Diversity, and Inclusion identifies the list of EDI groups within a short paragraph, however this does not address how the Proponent will ensure that EDI will be reflected in the recruitment, employment, and workforce of the proposed project.</p> <p>Mining culture has been repeatedly reported on in recent years as a hostile work environment, particularly for women and diverse populations.</p> <ul style="list-style-type: none"> Sexual harassment of women in mining (2022) MAC commit to action against racism and sexism (2020) Why women are leaving the mining industry (2021) 	<p>WAGE recommends that the Proponent provides further details as to how the employment and workforce of the proposed project will ensure that EDI is incorporated in the project.</p> <p>Should an Impact Assessment be required, note that as per the TISG template Section 3.5. Workforce requirements “must take “GBA Plus into consideration. The information must be presented in sufficient detail to analyse how historically excluded or underrepresented groups will be taken into account, including Indigenous groups and other relevant diverse subgroups”.</p>	<p>Include more data related to local and regional employment (hiring, retention, training), including related working policies and programs.</p> <p>To take into consideration a GBA Plus approach</p>

		<ul style="list-style-type: none">• MAC urges to diversify male, white industry (2022)		
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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"> • 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	<p>Section 15.3 Human Health, Quality of Life and Psychosocial Impacts</p> <p>Section 9.8 Employment and Workforce</p>	<p>As per WAGE-01 in Table 1, WAGE asks the proponent to consider the ways in which the proposed project could increase gender-based violence in the nearby communities.. Existing literature and research on gender-based violence have demonstrated the links between resource development projects and risks of GBV and sexual harassment for Indigenous, Métis, and Inuit women, girls, and gender-diverse peoples in Canada.</p> <p>The Project proposes a construction and operational workforce, and as those in the mining industry are predominately male, how might an influx of people (local, regional, or otherwise) potentially affect the nearby communities, temporary or otherwise?</p> <p>In addition to the recent population studies conducted by the Proponent, the Proponent should also review health dimensions to include gender-based violence. Health indicators in this area should include: 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)). Safety indicator should also be included: 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?). Human trafficking may also be of concern (source: National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019).</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, 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>Inclusion of potential GBV risks.</p>
WAGE-02	<p>Section 9.8.3. Equity, Diversity and Inclusion</p>	<p>As per WAGE-02 in Table 1, WAGE recommends that the Proponent take GBA Plus into consideration for the recruitment, training, and hiring of workers for the lifespan of the Project to satisfy TISG requirements and the Proponent's commitment to EDI.</p>	<p>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. 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>Consider the requirements of the TISG to include GBA Plus throughout Project lifecycle, engagement, consultation, mitigation, and to create baseline conditions.</p> <p>To take into consideration a GBA Plus approach.</p>

Please insert additional rows as necessary.

Overview of Gender-based Analysis Plus (GBA Plus)

GBA Plus is an analytical 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. 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.

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.

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 childcare 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.