

Strange Lake rare earth project - Torngat Metals Ltd.  
Reference number: 85969

## Strange Lake Rare Earth Mining Project

### Comments from the federal authorities on the draft version of the Joint Impact Statement Guidelines

<b>Ministry/Agency</b>	Women and Gender Equality Canada (WAGE)		
<b>Main contact and title</b>	Denise Gareau Director, GBA Plus Directorate, Research, Data, and Intersectionality (RDI) Branch	<b>E-mail</b>	<a href="mailto:FEGC.EvaluationImpacts-ImpactsAssessment.WAGE@fegc-wage.gc.ca">FEGC.EvaluationImpacts-ImpactsAssessment.WAGE@fegc-wage.gc.ca</a>
		<b>Phone</b>	819-938-1132

#### Instructions :

1. Please review the sections of the draft Joint Impact Statement Guidelines that apply to your department's or agency's mandate and expertise.
2. Using the table below, please include your recommendations on how the final Joint Impact Statement Guidelines should be modified:
  - Please indicate any corrections, additions or deletions to be made to the text. For each recommendation, please provide a clear justification. **For any additions, please ensure that the information is not already required and briefly explain the need for the addition.**
  - **Please take into account the context of the project** and draw on the elements contained in the [detailed project description](#) and the proponent's answers to the Summary of Issues (see Appendix A of the detailed project description).
3. Comments must be submitted no later than the end of **September 23, 2024** by e-mail to [StrangeLake@iaac-aeic.gc.ca](mailto:StrangeLake@iaac-aeic.gc.ca) All comments submitted will then be published on the Registry website for the project (Reference number 85969).

Strange Lake rare earth project - Torngat Metals Ltd.  
Reference number: 85969

Comment number (e.g. ECCC-01)	Draft Joint Guidelines section	Item for comment or modification	Comment or proposed change and justification
WAGE-01	Abbreviations and Short Forms (page iv)	Add “Gender-based violence (GBV)” to the list.	Gender-based violence (GBV) should be included in the list of abbreviations and short forms.
WAGE-02	1.1.3 Gender-based Analysis Plus (page 3)	<p>The first paragraph on GBA Plus in section 1.1.3 should be changed to the following:</p> <p><i>Additional text is in brown.</i></p> <p>“For consideration of the intersection of sex and gender with other identity factors (paragraph 22(1)(s) of the IAA), the Guidelines will refer to Gender-based Analysis Plus (GBA Plus). <i>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. IAAC’s <a href="#">Guidance: Gender-Based Analysis Plus in Impact Assessment</a> provides guiding principles and tools to apply GBA Plus in the Impact Statement.</i>”</p>	The definition of GBA Plus should be updated to match the current GBA Plus definition on <a href="#">WAGE’s website</a> .
WAGE-03	3.3.1 Project components and activities (pages 16-17)	<p>Revise the first bullet point under 3.3.1 as follows:</p> <p><i>Additional text is in brown.</i></p> <p>“The Impact Statement must:</p> <ul style="list-style-type: none"> <li>describe the project components, associated and ancillary works, and other characteristics to assist in understanding the potential environmental, health, social, and economic effects, and the potential impacts on Indigenous peoples and their rights, <i>and the conditions of non-Indigenous populations;</i>”</li> </ul>	<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>To support GBA Plus, the information provided for the Impact Statement must: be sufficiently disaggregated to support the analysis of disproportionate effects as per a GBA Plus as an intersectional approach. As much as possible, the data should be disaggregated by identity and cross-identify factors (e.g. by sex, gender, age, ethnicity, Indigenous identity, ability, and any other</p>

Comment number (e.g. ECCC-01)	Draft Joint Guidelines section	Item for comment or modification	Comment or proposed change and justification
			<p>community-relevant identity factors) and presented distinctly for each population group.</p> <p>As per <a href="#">IAAC's TISG Template</a>, 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 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>
WAGE-04	7.1.3 Federal requirements and information (page 42)	<p>Add the following bullet point (in brown):</p> <p>“For all baseline conditions, the Impact Statement must:</p> <ul style="list-style-type: none"> <li>• describe the baseline for the environmental, health, social and economic conditions (including social determinants of health) related to the project and the interrelations and interactions among them;</li> <li>• describe potential changes in the baseline conditions that are likely to occur in the future, if the project was not carried out, including changes due to future climate change;”</li> </ul>	<p>This section is missing a bullet point. See IAAC's <a href="#">TISG 7.1 Baseline methodology</a>.</p>
WAGE-05	7.2.1 Joint requirements and information (page 43)	<p>Add the following paragraph (in brown):</p> <p>“The Guidelines provide information requirements organized in categories that may be considered as VCs, or may be considered as intermediate components to inform the assessment of VCs.</p>	<p>This section is missing a paragraph. See IAAC's <a href="#">TISG 7.2. Selection of valued components</a></p>

Comment number (e.g. ECCC-01)	Draft Joint Guidelines section	Item for comment or modification	Comment or proposed change and justification
		<p>The VCs will help to organize the description of the effects of the Project required by the Guidelines.</p> <p>Indigenous groups may identify holistic VCs that encompass the effects on a number of individual environmental, health, social, or economic VCs (including social determinants of health). Where identified, the proponent should structure analysis and presentation of individual VC into an assessment of the overarching Indigenous VC. Proponents are encouraged to work with Indigenous groups to identify holistic VCs, which may increase the efficiency of the assessment and clarity of presentation. In the event that a VC is suggested by an Indigenous group but is excluded from the Impact Statement, the proponent must provide a justification for its exclusion.”</p>	
WAGE-06	Appendix 2 – Resources and Guidance – Gender-based analysis plus (pages 174-175)	<p>Remove:</p> <ul style="list-style-type: none"> <li>• <i>Demystifying GBA Plus Job Aid</i>. Women and Gender Equality Canada. Available at: <a href="https://women-gender-equality.canada.ca/gbapplus-course-cours-acsplus/assets/modules/Demystifying_GBA_job_aid_EN.pdf">https://women-gender-equality.canada.ca/gbapplus-course-cours-acsplus/assets/modules/Demystifying_GBA_job_aid_EN.pdf</a></li> <li>• <i>Intersectionality Job Aid</i>. Status of Women Canada. 2018. Available at <a href="https://women-gender-equality.canada.ca/gbapplus-course-cours-acsplus/assets/modules/Intersectionality_tool_job_aid_EN.pdf">https://women-gender-equality.canada.ca/gbapplus-course-cours-acsplus/assets/modules/Intersectionality_tool_job_aid_EN.pdf</a></li> </ul> <p>Add:</p> <ul style="list-style-type: none"> <li>• <i>Gender-based Analysis Plus resources</i>. Women and Gender Equality Canada. 2024. Available at <a href="https://www.canada.ca/en/women-gender-equality/gender-based-analysis-plus/resources.html">https://www.canada.ca/en/women-gender-equality/gender-based-analysis-plus/resources.html</a></li> <li>• <i>Gender-based Analysis Plus research guide</i>. Women and Gender Equality Canada. 2021. Available at <a href="https://www.canada.ca/en/women-gender-equality/gender-based-analysis-plus/resources/research-guide.html">https://www.canada.ca/en/women-gender-equality/gender-based-analysis-plus/resources/research-guide.html</a></li> <li>• <i>Gender-based Analysis Plus research checklist</i>. Women and Gender Equality Canada. 2021. Available at</li> </ul>	WAGE has updated its available resources on GBA Plus in July 2024.

Comment number (e.g. ECCC-01)	Draft Joint Guidelines section	Item for comment or modification	Comment or proposed change and justification
		<a href="https://www.canada.ca/en/women-gender-equality/gender-based-analysis-plus/resources/research-checklist.html">https://www.canada.ca/en/women-gender-equality/gender-based-analysis-plus/resources/research-checklist.html</a>	

Insert as many lines as necessary.