## Projet minier aurifère Novador

Commentaires des autorités fédérales concernant la version provisoire des lignes directrices individualisées relatives à l'étude d'impact

	Emploi et Développement social Canada / Employment and Social Development Canada		
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## Instructions:

- 1. Veuillez examiner les sections de la version provisoire des lignes directrices individualisées relatives à l'étude d'impact qui s'appliquent au mandat et aux expertises de votre ministère ou agence.
- 2. À l'aide du tableau ci-dessous, veuillez inclure vos recommandations sur la manière dont les lignes directrices individualisées finales relatives à l'étude d'impact devraient être modifiées :
  - Veuillez indiquer les corrections, les ajouts ou les suppressions à apporter au texte. Pour chaque recommandation, veuillez fournir une justification claire.
  - Veuillez tenir compte du contexte du projet et vous appuyer sur les éléments contenus dans la description détaillée du projet et les réponses du promoteur au sommaire des questions (voir à l'annexe A de la description détaillée du projet).
- 3. Les commentaires doivent être soumis au plus tard le <u>4 juillet 2024</u> par courriel à l'adresse suivante : <u>Novador@iaac-aeic.gc.ca</u> Tous les commentaires soumis seront ensuite publiés sur le site web du Registre pour le projet (Numéro de référence 86020).

Numéro du commentaire (p. ex., ECCC-01) / Comment number (e.g., ECCC- 01)	Section des Lignes directrices individualisées provisoires / TISG Section(s)	Élément à commenter ou à modifier / Item comment or modification	Commentaire ou modification proposée et justification / Comment or proposed change and rational
ESDC 01	3.5 Workforce Requirements, p.15.	"opportunities for employment outlining the anticipated number of full-time and part-time positions to be created, and timeline for when they will be created."	The statement does not specify the number of employment opportunities nor the level of employment opportunities that will be generated over each period of the project's life cycle (from construction to completion to operation).  It is recommended that employment opportunities be specified in the Impact Statement for the entire life cycle of the project, from its construction to its completion to its operation including the following: the number of employment opportunities anticipated at each phase of the project's lifecycle and the approximate length of each phase (months and years).
ESDC 02	3.5 Workforce Requirements, p.15.	"the region of origin of the projected workforce (local, regional, out-of-province or foreign employees), including the projected scenario and a qualitative summary of the other plausible scenarios, for each phase of the project."	It is recommended that clarity be provided as to what is being asked from the proponent in this statement: is it requesting the projected number of workers for the Project per area/region and which area/region provides the best options regarding the availability of workers for the Project?
ESDC 03	3.5 Workforce Requirements, p.15.	"the skill and education levels required for the positions."	It is recommended that the certification requirements also be included in this statement to read as follows: "the skill, education and certification levels required for the positions."
ESDC 04	3.5 Workforce Requirements, p.15.	"anticipated hiring policies and programs" and  "investment in workforce training."	It is recommended that the sources of the hiring and training programs be provided in the Impact Statement by the proponent in order to determine if they are government sponsored programs and at what level (federal or provincial). This will allow for an indication of the quality of the hiring and training programs the proponent intends to access.
ESDC 05	3.5 Workforce Requirements, p.15.	"the projected working conditions and schedule for construction and operation (e.g., working hours, rotating shifts)."	It is recommended that examples be provided in this section of the TISGs regarding what projected working conditions the proponent is being asked to provide in the Impact Statement.

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ESDC 06	3.5 Workforce Requirements, p.15.	"housing and accommodation needs of the workforce for the duration of the project."	It is recommended that the housing and accommodation needs referred to in the TISGs include access to quality daycare programs and facilities, therefore reading as follows: "housing and accommodation needs of the workforce, including access to quality daycare programs and facilities, for the duration of the project."
ESDC 07	3.5 Workforce Requirements, p.15.	"workplace policies and programs for Indigenous employment, and employment of other underrepresented groups."	It is recommended that it be specified in this section of the TISGs what underrepresented groups are being referred to and if it is those within the Project's region or in general (national, provincial).
ESDC 08	9.1.1. Baseline conditions, p.85.	"provide the specific social conditions of local communities on a disaggregated basis."	It is recommended that examples be provided in this section of the TISGs as to what specific social conditions the proponent is expected to provide in its Impact Statement.
ESDC 09	9.1.1. Baseline conditions, p.85.	"provide a comparison of data at the provincial, regional or national level, if possible, to better interpret baseline conditions."	It is recommended that examples of baseline conditions be provided for the proponent and how they are to be established by the proponent for their Impact Statement.
ESDC 10	9.2.1. Baseline conditions, p. 87.	"an overview of the <b>main economic activities</b> in the studied study areas, including <b>information</b> on the economically active actors of the local and regional population."	Is this statement referring to all main economic activities in the studied study areas or just those relevant to the Project? If it is referring to all, then why if they may not be relevant to the Project in question?
			What information is being requested with respect to economically active actors of the local and regional population?
			It is recommended that it be clarified as to what main economic activities in the studied study areas are being requested and for what reason.
			It is recommended that the information being requested regarding economically active actors be clarified.

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ESDC 11	9.2.1. Baseline conditions, p. 87.	"an overview of the businesses that are likely to provide the goods and <b>services</b> needed for the project, which must note whether these suppliers are located outside of the study area, as well as <b>the affiliation of those businesses</b> ."	What services are being referred to in this statement? Would this include skills and jobs training? Would it include employment services?  What exactly is meant by the affiliation of those businesses? Is it a request for information regarding who the business is owned and operated by?  It is recommended that clarity be provided regarding the requested services and the requested information on affiliation of businesses.
ESDC 12	9.2.1. Baseline conditions, p. 88.	"any local, provincial, or federal economic development plans for the study area; and local and regional workforce development and training plans."	Is this statement in reference to what is available to the proponent or what the proponent intends to access regarding local economic and workforce development and training plans?  It is recommended that clarity be provided regarding why local economic and workforce development and training plans be provided by the proponent in their Impact Statement.
ESDC 13	9.2.2. Effects to economic conditions, p.88.	"the sources and methodologies used for developing multipliers and estimates and, where a generic multiplier may not accurately reflect the specific situation of the project, provide evidence of specific economic activity that will result from the project going ahead."	The last section of the statement is unclear: is it requesting evidence of economic activity that would not allow the project from going ahead? If so, it is recommended that the last section of the sentence read as follows: "that will result in the project from going ahead".
ESDC 14	10.3.3.1. Base conditions, p.111.	"workforce development and training plans for Indigenous peoples, including those living in urban areas."	Reference could be made in this section to available ESDC programs that provide specific training to Indigenous Peoples, such as Indigenous Skills and Employment Training (ISET)  Program and other ESDC programs for the general population found here.

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ESDC 15	10.3.3.2.1. Employment, p. 112.	"if applicable, the measures that will be taken to increase the employment of Indigenous peoples including Indigenous people living in urban area, <b>including training programs</b> and measures to address gender-based violence and discrimination."	Please refer to ESDC 14 comment.	