

Projet minier aurifère Novador – Probe Gold inc.
 Numéro de référence : 86020

Projet minier aurifère Novador

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

Ministère/agence	Women and Gender Equality 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 **4 juillet 2024** par courriel à l'adresse suivante : Novador@iaac-aeic.gc.ca Tous les commentaires soumis seront ensuite publiés sur le site web du Registre pour le projet (Numéro de référence 86020).

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Numéro du commentaire (p. ex., ECCC-01)	Section des Lignes directrices individualisées provisoires	Élément à commenter ou à modifier	Commentaire ou modification proposée et justification
WAGE-01	Abbreviations and Short Forms (p. v-vi)	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	3.4 Project components and activities (p. 11)	<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 whose 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>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>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.</p> <p>(Source: Safe Workplaces for All – Addressing Sexual Harassment in Canadian Mining)</p>	
WAGE-03	3.5 Workforce requirements (p. 16)	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 provided must be detailed enough to allow analysis of how the historically excluded or underrepresented groups will be taken into consideration, including Indigenous peoples or other relevant population subgroups various population groups .
WAGE-04	5.1 Summary of public engagement activities (p. 21)	Recommend the use of the term "various population groups" instead of "subgroups" in the TISG as used by Statistics Canada " Population group of person ".	<ul style="list-style-type: none"> The method used (e.g., community education, community-based research and development of solutions), the consultation site, the people, including those from various subgroups population groups, and the organizations consulted;
WAGE-05	7.1 Baseline methodology (p.30)	This section is missing a paragraph from the TISG guideline 7.1 Baseline methodology.	Above "For the baseline conditions, the Impact Statement must:" please include the following paragraph.

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			<p>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 population groups at disproportionate risk of marginalization, exclusion, and discrimination (e.g. analysis of gender-based violence (GBV)). The proponent must respect the obligation of protecting personal information and adopt the established standards for the management of Indigenous data (e.g. the First Nations principles of Ownership, Control, Access, and Possession (OCAP) or standards adopted by an Indigenous group).</p>
WAGE-06	9.0 Social and Economic Conditions (pg. 85)	<p>Section 9.0 states that the Impact Statement must describe the existing social conditions for potentially affected local communities and should describe baseline conditions using disaggregated data for various potentially affected population groups, this section should make clear this includes Indigenous persons. Although there is a separate section for Indigenous Peoples (Section 10), Section 9.0 should also account for Indigenous persons who reside in urban areas/local community.</p> <p>The separation of issues/directives by population groups in TISGs is not part of the common practice observed by WAGE. In terms of GBA Plus best practice, the first step is to identify all the issues, then to identify who is affected by them and how. In step 3, GBA Plus aims to understand how and why experiences and outcomes differ between groups. Applying GBA Plus requires reflection on unequal power relations, histories, social norms and roles, unequal distribution of resources and other systems and structures that can generate and</p>	<p>Section 9.0 states that the Impact Statement must describe the existing social conditions for potentially affected local communities, including Indigenous persons.</p> <p>Describe baseline conditions using disaggregated data for various potentially affected population groups, (e.g., women, youth, older persons, and Indigenous peoples Elders, taking into account intersecting identity factors [intersectional approach]) and their different access to resources, opportunities and services within the community to support GBA Plus.</p> <p>Note on above terminology: substitute the term Elders for Older persons or older adults as this term is specific to a particular status in some Indigenous communities. (See: Guide to Equity, Diversity, and Inclusion) (see also on pg. 111).</p>

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		<p>perpetuate inequalities (e.g. racism, sexism, colonialism, ableism).</p> <p>WAGE recommends that only after this analysis can the options be separated by provincial and federal jurisdiction, since in developing the options, it is important to examine all the inequalities revealed by the analysis, and their sources. The aim is for the options to be tailored to particular groups, to remedy existing inequalities, to reflect the different needs of groups of people, and to reduce barriers to access to the initiative by certain groups (Source: GBA Plus: WAGE Detailed Guide - available only on the Government of Canada network).</p> <p>In short, if the analysis begins by separating out distinct populations, we can't understand who and how certain population groups are affected, its magnitude and these interactions. We know, or are concerned, that Indigenous communities are more affected by certain resource projects, so concrete solutions for this population and its diversity are essential.</p>	
WAGE-06	10.2.3 Mitigation and enhancement measures (p. 90)	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.	<p>Add the following bullet point to the existing four bullet points in this section.</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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		Enforcement must include real consequences for harassing or violent behaviour.”	
WAGE-07	10.3.1.1. Baseline conditions (pg. 99)	For consistency, the acronym for gender-based violence must be included.	<ul style="list-style-type: none"> health outcomes of interests (i.e., current health status), such as chronic diseases, mental health conditions, gender-based violence (GBV), rates of alcoholism and drug addiction and suicide rate;
WAGE-08	10.3.3 Economic Conditions (pg. 112)	Recommend the use of the term "various population groups" instead of "subgroups" in the TISG as used by Statistics Canada " Population group of person ".	<ul style="list-style-type: none"> 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 various population groups.

Insérer autant de lignes que nécessaire.