

**Federal Authority Advice Record (FAAR)**

**The FAAR must be submitted to the Registry by January 26, 2024.**

**New Nain Airport Project – Nunatsiavut Government**

Registry reference no: 87156

Department/Agency	Women and Gender Equality Canada (WAGE)
Lead contact	Denise Gareau, Director, GBA Plus Directorate, Research, Data, and Intersectionality (RDI) Branch
Full address	22 Eddy Street, 10 <sup>th</sup> Floor Gatineau, QC J8X 2V6
Email	<a href="mailto:FEGC.EvaluationImpacts-ImpactsAssessment.WAGE@fegc-wage.gc.ca">FEGC.EvaluationImpacts-ImpactsAssessment.WAGE@fegc-wage.gc.ca</a>
Telephone	819-938-1132
Alternate Contact	Jessica Bialek, A/Senior Analyst, GBA Plus Directorate, Research, Data, and Intersectionality (RDI) Branch <a href="mailto:Jessica.Bialek@fegc-wage.gc.ca">Jessica.Bialek@fegc-wage.gc.ca</a>

- 
1. a) 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.

b) 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

- 
2. Is your department or agency in possession of specialist or expert information or knowledge in one of your fields of expertise 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 (GBV).

---

3. Has your department or agency 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?

Please specify if applicable.

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)?

Please provide an overview of the information or advice exchanged.

No.

---

5. Does your department or agency have additional information or knowledge about the project not specified above, including information about its geographic, environmental, economic or social context (for example, location of protected or sensitive areas, history between local communities and proponent or similar projects, local or regional social or economic concerns)?

Please specify if applicable.

Below are the links to further information on GBA Plus. Information on GBA Plus and gender-based violence (GBV) is also available after Table 2.

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.](#)
- 

6. From the standpoint of your department's mandate and expertise, what are the main issues concerning the project?

For each key issue, please:

- 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;
- briefly provide solutions to the issue, including information or studies that, if applicable, should be requested to the proponent in the Tailored Impact Statement Guidelines, potential mitigation measures, or regulatory requirements relevant to the issues;
- provide a concise, plain-language summary of the issue for inclusion in the Summary of Issues.

The information provided will be taken into consideration by the Agency to formulate an opinion on whether an impact assessment is required and, if applicable, will be taken into account in developing project-specific Tailored Impact Statement Guidelines in the next steps of the impact assessment process.

Please use Table 1 to answer this question.

- 
7. If applicable, specify any additional information the proponent could provide in the Detailed Project Description or in its response to the Summary of Issues that:
- would make it possible to verify whether certain minor issues could be addressed and managed by clear measures, existing guidelines, other regulatory processes or other existing tools;
  - help the Agency to provide an opinion if an impact assessment is required, or
  - would support the tailoring of the Impact Statement Guidelines if the Agency is of the opinion that an impact assessment is required.

These clarifications and additional information will be included as specific questions/issues in the Summary of Issues provided to the proponent.

Please use Table 2 to answer this question.

---

Women and Gender Equality  
Canada

Name of department or agency

Director

Speaker title

January 16, 2024

Date

**Table 1: Key issues to inform the impact assessment process**

The Agency asks that federal authorities guide expert advice on the Agency's approach to project specific tailoring, if the Agency is in the opinion that an impact assessment is required. This approach aims to focus the assessment on the Project's key issues, with an emphasis on the prevention of adverse environmental effects in areas of federal jurisdiction. In determining key issues, federal authorities should be mindful of the Project's context (size, scope, location), Indigenous knowledge and perspectives, and public concerns.

Potential effects that are considered minor, or that can be mitigated through clear measures, existing guidance or other regulatory processes, may be subject to simplified information requests or be disregarded. Advice from federal authorities on key issues and solutions - and on the scope and detail of the studies and information requested - will enable the Agency to focus the analysis on those issues that are important for the impact assessment process.

Comment ID	Relevant section of the initial project description	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 present comments by organization and comment number</i></p> <p><i>e.g.: IAAC-01</i></p>	<p><i>If the comment relates to a specific section of the initial project description, please provide the reference.</i></p>	<p><i>Identify valued component(s) or factors to consider—within the mandate of your department or agency—to which the potential effect or issue applies.</i></p>	<p><i>Please 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"> <li>• <i>the sequence of potential effects;</i></li> <li>• <i>the relevant context that specifies why this is a key issue;</i></li> <li>• <i>key uncertainties that should be addressed in the impact assessment;</i></li> <li>• <i>Indigenous or public concerns or perspectives;</i></li> <li>• <i>scientific data or traditional knowledge, including from previous projects, that justifies the inclusion of the key issue in the project assessment.</i></li> </ul>	<p><i>If applicable, please provide brief solutions/advice to address the issue or potential effect, including:</i></p> <ul style="list-style-type: none"> <li>• <i>studies or information relevant to describing and characterizing the potential effect, including any guidance for data collection or analysis or existing data sources to inform the assessment;</i></li> <li>• <i>any powers your department or agency has that may mitigate, manage or set conditions related to the issue;</i></li> <li>• <i>advice or policies to frame and mitigate the potential effect;</i></li> <li>• <i>standardized mitigation or monitoring measures that could manage potential effects, including follow-up on monitoring activities;</i></li> <li>• <i>commitments the proponent could make to respond to the issue.</i></li> </ul>	<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, if applicable.</i></p>
<p><b>WAGE-01</b></p>	<p><b>2.4.1 Employment and Procurement – Workforce</b></p>	<p><b>Economy, Employment, Infrastructure and Services</b></p>	<p>While a precise estimate of the workforce will not be available until Spring 2024. <b>Sections 2.4.1. Workforce and 2.4. Employment and Procurement</b> note an approximate number of employees for operations (10) and construction (several hundred) (pg. 28).</p>	<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>More details on workforce and proactive equality, diversity and inclusion (EDI) measures are needed.</p>

	<b>2.4.3 Equity, Diversity and Inclusion</b>		<p>In response to these workforce estimates, some proactive employment measures have been presented in <b>Section 2.4.3. Equity, Diversity and Inclusion</b> as Nunatsiavut Government (NG) is an equal opportunity employer (pg. 29). Some basic elements of EDI are identified, including Indigenous persons and immigrants as underrepresented groups. However, this short section 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>While WAGE understands that detailed information on workforce will be revealed in March and May 2024, WAGE recommends the proponent examine how EDI will be ensured in the hiring process proactively rather than reactively. If the Proponent foresees several hundred workers employed in the construction phase and <b>Table 6.1</b> indicates that the presence of workforce has potential project effects for both construction and operation for the following: health and well-being and economy, employment, infrastructure and services, proactive mitigation measures and/or strategies would be beneficial to include.</p>	<p>Should an Impact Assessment be required, note that as per the <b>TISG</b> template <b>Section 3.5 Workforce requirements</b> “must take GBA Plus into consideration. The information must be presented in sufficient detail to analyze how historically excluded or underrepresented groups will be considered, including Indigenous groups and other relevant diverse subgroups.”</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: <a href="#">IAAC’s GBA Plus Guidance</a>)</p>	<p>GBA Plus and EDI considerations are required as part of early planning and proactive and mitigating measures developed.</p>
<b>WAGE-02</b>	<b>6.2 Human Environment</b>	<b>Health and Well-being</b>	<p><b>2.4 Employment and Procurement</b> states that “two teams of specialized construction workers and day labourers will be deployed in Nain throughout the seasons under the supervision of site management team and Project engineers.”</p> <p><b>2.4.1.1. Construction</b> notes that “at least several hundred workers are anticipated to be employed in the construction phase.”</p> <p>The population of Nunatsiavut is 2,323 (as of 2021) and the population of Nain is a mere 1,204 (as of 2021). As suggested in <b>Table 5.2</b>, Nain’s population is dominantly Inuit, with more than 60% of the community population being either couple-family households with children or one parent family households. In sum, the proposed project will bring in a large volume of workforce into a small Indigenous community, if most of the workforce is contracted outside of the community of Nain. The IPD does mention a potential work camp in <b>2.2.5 Preliminary Engineering Design</b>. If a work camp will be</p>	<p>The proponent should consider the inclusion of GBV risks in section <b>6.2.5 Community Health and Well-being</b>.</p>	<p>Inclusion of gender-based violence (GBV) risks.</p>

			<p>constructed, the Proponent must consider the potential impact of gender-based violence (GBV).</p> <p>Historically, Indigenous women experience a higher rate of sexual assault compared to non-Indigenous women and research has shown a linear relationship between industrial camp populations, sexual violence, and the trafficking of Indigenous women in Canada. (WAGE’s GBV page: <a href="#">What is gender-based violence?</a>).</p> <p>Consideration of GBV is also recommended when assessing potential risk of airline and security staff who are <a href="#">likely to be</a> male, may be contracted from outside of Nain, and who may stay overnight (or longer) after a flight.</p> <p>In addition, the construction of an access road poses some potential GBV risks. Prior to the new Project location, the Nain airport was within walking distance, and the draft IPD states that the access road will be 13km from Nain to the new Airport location. While the access road is still relatively short, there is a potential risk of trafficking for those that do not own a vehicle (pg. 40), do not take the shuttle (pg. 92), and particularly for Indigenous women and girls in such remote areas. (source: <a href="#">National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019 pg. 75</a>)</p>		
--	--	--	--	--	--

*Please insert additional lines if necessary*

Table 2. Details 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 the Issue, Concern or Uncertainty	Clarifications or additional information	Plain-language summary for inclusion in Summary of Issues
<p><i>Please identify comments by organization and comment number.</i></p> <p>e.g. AEIC-01</p>	<p><i>If the comment is related to a specific section of the Initial Project Description, please provide a reference.</i></p> <p><i>You may also choose to copy the relevant text here.</i></p>	<p><i>Provide a description of the issue, concern or uncertainty that the proponent could include in its Detailed Project Description, which could be framed and managed by clear measures, existing guidelines, regulatory processes or other existing tools, and thus be the subject of a simplified information request in the guidelines, or simply be disregarded.</i></p>	<p><i>Specify what additional information the proponent could provide in the Detailed Project Description to address the issue, concern or uncertainty, for example:</i></p> <ul style="list-style-type: none"> <li>• <i>clarifications to elements of Project Description (e.g. components, activities, locations or alternatives);</i></li> <li>• <i>proposals on Project design changes that could avoid effects;</i></li> <li>• <i>evidence that could demonstrate that the effects will be negligible;</i></li> <li>• <i>evidence that standard mitigation measures will reduce or eliminate potential effects;</i></li> <li>• <i>commitments the proponent could make to respond to the question/issue, including the implementation of federal operational policies or guidance documents.</i></li> </ul>	<p><i>For issues to be included in the Summary of Issues, provide a concise, plain-language synopsis of the issue and any questions or instructions for the proponent, if applicable.</i></p>
<p><b>WAGE-01</b></p>	<p><b>2.4.1 Employment and Procurement – Workforce</b></p>	<p>As per WAGE-01 in Table 1, WAGE asks the proponent to address the ways in which EDI will be reflected in the recruitment, training, and hiring of workers for the lifespan of the project to satisfy TISG requirements and the proponent’s commitment to EDI. The proponent should also take GBA Plus into consideration (<a href="#">IAAC GBA Plus Guidance</a>: Table 1: Examples: What Difference does GBA Plus Make? And Section 5. GBA Plus in follow-up programs)</p>	<p>WAGE advises the proponent to address how the proposed project will impact the community of Nain in terms of workforce using disaggregated data of the local population. Some of this data is already relayed in <b>section 5.1.3.1 Population</b> in tables 5.1. Population, 5.2. Indigenous Identity, 5.4 Family and Household Characteristics and section 5.1.3.5 Employment and Income in tables 5.7 Occupation by Gender and 5.8 Employment and Income by Gender.</p> <p>Synthesizing these sets of data with R8: Preliminary Engineering Services and R10: Construction and Supply</p>	<p>Consider how EDI can be integrated in the recruitment, training, and hiring of workers.</p> <ul style="list-style-type: none"> <li>• EDI is aimed at addressing the ongoing exclusion of under-represented groups and EDI initiatives measure and track progress towards “diversity” and representation.</li> </ul>

	<p><b>2.4.3 Equity, Diversity and Inclusion</b></p>		<p>Strategy will help support the Proponent’s commitment to integrate EDI in the workforce.</p> <p>From GBA Plus perspective, it is also important to look at the impacts from different social locations and intersections to ensure considerations for all potentially impacted population groups.</p>	<p>GBA Plus considerations should also be better reflected.</p> <ul style="list-style-type: none"> <li>• GBA Plus recognizes the interconnected nature of identity factors and personal characteristics.</li> <li>• GBA Plus considerations go ‘beyond the numbers’. In addition to representation, GBA Plus informed approaches seek to create a workplace culture that values and supports diverse backgrounds, experiences, and perspectives which in turn helps break down barriers to full participation and advancement for those who have historically been excluded.</li> </ul>
--	---	--	--	---

*Please insert additional lines if necessary*

**Overview of Gender-based Analysis Plus (GBA Plus)**

GBA Plus is an analytical tool to support the development of responsive and inclusive initiatives, including policies, programs, and other initiatives. GBA Plus is a process for understanding who is impacted by the issue 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 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.

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.

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 child care 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.