

## 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	Employment and Social Development Canada (ESDC)
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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.

**ESDC does not exercise powers, nor perform specific duties or functions related to the Project to enable it to proceed.**

**The ESDC Minister's powers, duties and functions extend to and include all matters relating to human resources and skills development in Canada or the social development of Canada over which Parliament has jurisdiction, and which are not by law assigned to any other Minister, department, board or agency of the Government of Canada.**

- 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.

**While ESDC is not engaging with Indigenous groups regarding specific projects, it can provide the IAAC with information about relevant programming to assist in responses to Indigenous nations and members of the public.**

**ESDC also offers a suite of programming to promote an efficient and inclusive labour market that includes the following:**

**Indigenous Skills and Employment Training (ISET) Program**

- The ISET Program provides funding to Indigenous service delivery organizations across Canada that design and deliver job training services to First Nations, Inuit, Métis and urban/non-affiliated Indigenous people in their communities.
- The ISET service delivery organizations work closely with employers to identify Labour Market needs. Organizations link training needs to the job market by providing skills and training required to find a job such as: a suite of skills development and job training, from essential skills such as literacy and numeracy to more advanced training for in-demand jobs.
- They also offer a range of wrap-around services (such as help with childcare supports and transportation) during training in order for individuals to achieve long-term career goals. Service delivery organizations are responsible for retaining client information such as: number of skilled workers, training history, and education (Certificates/Diplomas) and Apprenticeships.

**Other ESDC programs and services can be found [here](#).**

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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.

**As a federal authority, ESDC provides advice on: social development; learning, skills development, employment, unemployment, underrepresented groups, and; working conditions and workplace relations, including relevant programming with respect to Indigenous Peoples.**

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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.**

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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.**

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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.

**No.**

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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.

**Below are some examples of subject areas that ESDC would focus on in its review of the Project (to be developed at subsequent stages of the Project documentation):**

- **Community profiles with the following socio-economic information relevant to ESDC's mandate:**
  - The current socio-demographic characteristics of the economic sector workforce of the project;
  - The labour force characteristics by age group and sex (if possible) of all impacted communities including the availability of skilled and unskilled workers, existing working conditions, wages and/or average salary range, full-time and part-time employment and training; inclusion of a hiring strategy and any efforts made towards promoting an inclusive labour market;
  - The anticipated number of jobs created, how they will be added over the project's lifespan, jobs created in Canada vs. other countries, the type of skills and knowledge that could be required to support the completion of the project; how the project's budget will be spent in the local region and the province and how it would benefit the local area;
  - The main economic activities in the study area;
  - Accessibility to programming similar to the following: Indigenous Skills and Employment Training Program (ISET), and Skills and Partnership Fund (SSWP);
  - Employment barriers to participation for local under-represented groups such as visible minorities, indigenous person, people from a lower socioeconomic status, persons with disabilities, and GBA Plus groups;
  - Availability, affordability and appropriateness of childcare as part of the measurement of the change in infrastructure in services; and
  - Baseline conditions and projected impacts, for example, as outlined in the Tailored Impact Statement Guidelines (TISG) template.
- **Information regarding both local and other relevant labour markets. This includes initial labour market conditions and the anticipated impacts of the Project on the labour market, including:**
  - training and hiring strategies, including the intent to support diversity and inclusion throughout them;
  - effects to employment and how any adverse effects to employment would be managed, or mitigated;
  - applying a gender-based analysis plus (GBA Plus) lens in considering the effects to employment (e.g., consideration of underrepresented groups).

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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.

- **It is recommended that engagement take place with the existing ESDC programming, for example, ISET service delivery network, occur to ensure that the existing federal training network is utilized.**
- **It is encouraged for the proponent to make a clear and early attempt at applying GBA Plus throughout their analysis. In situations where it may not be feasible to provide all the necessary information, particularly in the initial stages of the project, we request that the proponent clarifies their intentions to implement GBA Plus. This can be achieved by specifying the information they intend to include in the future, aiming to minimize the volume of comments due to missing details.**

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Sarah Strapps

Name of department or agency

Director of Policy Integration and  
Special Projects (PISP), Skills  
and Employment Branch (SEB),  
ESDC

Speaker title

January 19<sup>th</sup>, 2024

Date

**Comment Table – New Nain Airport Project – Initial Project Description (IPD)**

- **This table** will enable you to describe potential project effects.<sup>1</sup> The Impact Assessment Agency of Canada (the Agency) requires detailed advice to assist the Agency in understanding whether the Proponent has adequately characterized potential adverse effects of the Project and to improve the Proponent’s Initial Project Description before a formal submission. Please refer to prompts in the table to guide your responses.

*Table: Description of the potential effects of the Project and the management of effects*

Comment ID	Document Reference	Valued Component	Project Component	Description of the Potential Effect (Context and Rationale)	Legislative and Regulatory Involvement	Instructions to the Proponent	Adequacy of Responses in Final IPD to ESDC’s Comments on the Draft IPD of October 2023
Please identify comments by organization and comment number.	If the comment is related to a specific section of the document, please provide a reference (e.g. title, section, subheading, page number).  You may also choose to copy the relevant text here.	Identify the valued component(s)—within the mandate of your department, ministry or agency—to which the effect applies.  This may include components of the environment, health, social or economic conditions.	If applicable, please indicate the project component or activity that could cause the described effect.  If the effect is linked to a power, duty or function, please identify the project component or activity that would be regulated,	For each effect within your mandate (one effect per row), please provide the context and rationale. In your response, please respond to following points: <ul style="list-style-type: none"> <li>• Describe whether the Proponent has adequately articulated the <b>effect</b>. Provide rationale. If a potential effect on a valued component is not described adequately, explain what is lacking or unclear and describe any possible link between the effect and a project activity or component.</li> <li>• Describe whether the Proponent has identified and adequately articulated <b>mitigation and/or monitoring measures</b> to address the potential effect. Provide rationale. <ul style="list-style-type: none"> <li>a. If the Proponent has identified mitigation measures, provide your expert opinion on whether these mitigation measures are appropriate, well understood and of proven effectiveness.</li> </ul> </li> </ul>	Does your department, ministry or agency have powers, duties or functions associated with this effect? Could the effect be managed through existing legislative or regulatory mechanisms?  If yes: <ul style="list-style-type: none"> <li>• Identify the act, regulations, and any associated power, duty or function.</li> <li>• Indicate whether and how the mechanism would <u>mitigate, manage or set conditions</u></li> </ul>	Provide a specific, actionable request for the proponent.	<p><b>Adequate:</b> Sufficient in quality; meets expectations for socio-economic considerations.</p> <p><b>Partially Adequate:</b> Lacking in some respects and therefore not fully meeting expectations for socio-economic considerations.</p> <p><b>Inadequate:</b> Not sufficient and lacking in quality; does not meet expectations for socio-economic considerations.</p>

<sup>1</sup> *effects* in this context means changes to the environment or to health, social or economic conditions and the positive and negative consequences of these changes.

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			<p>monitored, or enabled by the power, duty or function.</p>	<p>b. If not, provide advice on how the effect could be managed through well-understood mitigation measures, and identify such measures. Identify existing guidance documents that the Proponent would be expected to follow.</p> <ul style="list-style-type: none"> <li>Describe whether the Proponent has adequately articulated the potential for <b>residual effects</b> after mitigation has been applied. Provide a rationale. If the Proponent's description is inadequate, provide advice on the potential for residual effects.</li> <li>(NRCan and ECCC only): If the effect is related to greenhouse gas emissions from the Project, describe whether the Proponent has adequately characterized emissions scenarios. Were the project activities adequately scoped?</li> </ul> <p>If the Proponent has not provided enough information to answer the questions above, please identify what additional information would be required in the IPD to assist you in answering these questions in the rightmost column.</p>	<p>that would address the effect.</p> <ul style="list-style-type: none"> <li>Indicate whether the exercise of an associated power, duty or function would involve public and Indigenous consultation.</li> </ul> <p>Does your department, ministry or agency have any established or emerging policies or directives that are relevant to the Project? Is the Project compatible or incompatible with the relevant policies or directives?</p> <p>If the Proponent has not provided enough information to answer the questions above, please identify what additional information would be required in the rightmost column.</p>		

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ESDC - 01	<b>2.4 Employment and Procurement, p.34.</b> <i>“Two teams of specialized construction workers and day labourers will be deployed in Nain throughout the seasons under the supervision of a site management team and Project engineers. These teams must be self-sufficient in all respects (e.g., housing, electricity, food, drinking water, wastewater, safety, evacuation) in the event of accidents.”</i>	Employment/Socio-Economic Conditions		Section would benefit by clarifying how “self-sufficiency” during the construction phase will be achieved and maintained.		The proponent should clarify how the self-sufficient working conditions during the construction phase will be implemented and any plans for dealing with workplace accidents/occupational health and safety in a remote setting.	<b>Inadequate:</b> The proponent has not clarified in this section how the self-sufficient working conditions during the construction phase will be implemented nor included a plan to address workplace accidents/occupational health and safety in a remote setting.
ESDC - 02	<b>2.4 Employment and Procurement, p. 34.</b> <i>“Once the Airport and Access Road are open, specialized Airport operations personnel will be</i>	Employment/Training and Apprenticeships		Section would benefit by outlining how the proponent will manage year-round operations in terms of personnel available.		The proponent should outline their human resources plan to successfully operate the airport and its associated facilities, such as access roads once the project is completed.	<b>Partially Adequate:</b> The proponent has indicated its intention to provide human resource information regarding the construction and operation of the proposed project as it becomes available. The proponent,

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	<p><i>on hand to ensure the smooth running of the Airport. The Access Road will have to be maintained on an annual basis and accessible year-round."</i></p>						<p>however, does not indicate in this section how it intends to acquire the necessary human resources information regarding the proposed project.</p> <p>2.4.1 Workforce p.28 (final IPD version)</p> <p>Detailed information on the workforce will be provided in R8: Preliminary Engineering Services, which will be available in March 2024, and R10: Construction and Supply Strategy, available in May 2024. The proponent will supply updated information for the construction and operations phases as it becomes available. The data will include an estimate of the types of positions required (according to the National Occupational</p>



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							Classification System 2021), approximate timelines for positions and whether positions are full-time or part-time, directly hired or contracted out.
ESDC - 03	<p><b>2.4.3 Equity, Diversity, and Inclusion, p. 35.</b>  <i>"The EDI Plan for the Project will consider business and employment access for members of underrepresented populations."</i></p>	Employment/Indigenous Peoples		<p>Section should clarify how the proponent will implement EDI in business and employment access. How will the proponent enable access locally for members of underrepresented populations (e.g. women, persons with disabilities), while giving preference to Nunatsiavut Beneficiaries? How will the proponent implement EDI for workers who may be hired for the project from outside the Nunatsiavut region?</p>		<p>The proponent should specify how it plans to leverage employing the local population and hiring from underrepresented groups during the project's completion and operation.</p>	<p><b>Inadequate: While the proponent has specified the inclusion of Indigenous persons and immigrants in this section of the final IPD, it still does not address how it plans to leverage employing the local population and hiring from underrepresented groups through the project's EDI Plan.</b></p> <p>2.4.3 Equity, Diversity and Inclusion p.29 (final IPD version)</p> <p>The EDI Plan for the Project will consider business and employment access for members of underrepresented populations, including Indigenous persons and immigrants.</p>

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ESDC - 04	<b>5.1.3.5 Employment and Income – the entire section pp. 63-65.</b>	Socio-Economic Conditions/Economic Impact/Employment		Section would benefit by directly linking Nain's employment and income levels to the Project itself, and by answering the following questions: does the region have enough workers to fulfil the labour/skills needs required to construct the proposed New Nain Airport over the short, medium, and long-term?		The proponent should provide information on the availability of the local workforce and how potential labour/skills shortages will be addressed.	<b>Inadequate: The proponent has not provided any additional information in this section on the availability of a sufficient workforce to construct the proposed project over the short, medium, and long-term.</b>