

**Federal Authority Advice Record (FAAR)**

**The FAAR must be submitted to the Registry by April 10, 2024.**

Summit Lake PG LNG Project – JX LNG Canada Ltd.

Agency File: 005908

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.

Please use Table 1 to answer this question.

**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 child care 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.

Please use Table 2 to answer this question.

- **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 involved

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

Speaker title

April 5, 2024

Date

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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
<i>Please identify comments by organization and comment number.</i>	<i>If the comment is related to a specific section of the Initial Project Description, please provide a reference.</i>	<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>	<i>Specify what additional information the proponent could provide in the Detailed Project Description to address the issue, concern or uncertainty.</i>	<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>
<b>ESDC-01</b>	<b>2.0, 2.1</b>	The economic benefits are described generally to include employment, business opportunities, increased GDP and government revenue, and local and Indigenous contracting work for construction/operation.	Details are lacking, insufficient, or imprecise on the following: <ul style="list-style-type: none"> <li>- The potential economic benefits, including estimates.</li> <li>- The definition of the measure “thousands of person-years of employment” (p. 36): How long is the construction period expected to take and how long will employment be provided?</li> <li>- It is also noted that the Project provides education and employment training: who is</li> </ul>	The Project’s purpose is to provide LNG as a sustainable form of energy to both the local economy and for export.  The Project description does not provide sufficient information on the potential economic benefits of the Project, including employment or training.

			<p>providing/funding this training and who is benefitting?</p> <ul style="list-style-type: none"> <li>- The Project indicates that it would provide opportunities for local and Indigenous for contracting work: how will prioritization and recruitment occur; and how many construction jobs will result?</li> </ul>	
<b>ESDC-02</b>	<b>2.1</b>	The benefits listed in this section should be more detailed, both here and elsewhere in the Project description.	<ul style="list-style-type: none"> <li>- Be more precise about how many jobs will be created, how many will be permanent, contract, direct or indirect.</li> <li>- Provide details on what type of training will be provided at local colleges and universities, and if the promoter will fund this training.</li> <li>- Elaborate on the meaning of "significant ongoing economic benefit to the local community and local Indigenous groups" (p. 36).</li> <li>- Elaborate on the meaning of "associated new business development opportunities" (p. 36).</li> </ul>	The list of the Project's benefits could be more detailed.

<p><b>ESDC-03</b></p>	<p><b>2.1</b></p>	<p>Given the Proponent references that the Project will “Provide education and employment training for members of local Indigenous communities” (p.36), it is recommended that the Proponent engage and discuss with the Indigenous Skills and Employment Training (ISET) Program service delivery providers, so they can be aware of the skills and training needs as it relates to the Project including an understanding of all the socio-economic benefits/impacts on communities.</p> <p>It should also be noted that the anticipated socio-economic impacts of this Project align with the Government of Canada’s commitment to reconciliation and ongoing implementation of the Truth and Reconciliation Commission of Canada’s Call to Action #7, and shared priority #102 of Canada’s United Nations Declaration on the Rights of Indigenous Peoples Act Action Plan, both of which include elements related to employment.</p>	<p>It is strongly recommended that the Proponent engage with the ISET Program service delivery organizations in the surrounding Project area to:</p> <ul style="list-style-type: none"> <li>- identify whether Indigenous people and businesses will receive prioritized or targeted employment opportunities.</li> <li>- identify how the Proponent will enhance collaboration with local Indigenous people and communities, and develop strategic, targeted training programs.</li> </ul>	<p>While the Proponent identified that the Project could result in key positive benefits for Indigenous people, communities, and businesses, notably employment opportunities, this information should also be shared with the establish ISET service delivery providers.</p>
<p><b>ESDC-04</b></p>	<p><b>7.0</b></p>	<p>The Proponent has identified the following Indigenous nations that will be involved in engagement for the Project: Lheidli-T'enneh First Nation – Gbenga Ayansola; McLeod Lake Indian Band; Nazko First Nation; West Moberly First Nations; Nak'azdli Whut'en; Metis Nation of British Columbia; and British Columbia Metis Federation.</p> <p>It is recommended that the Proponent also engage with the Indigenous Skills and Employment Training (ISET) Program service delivery providers regarding the Project (as mentioned in ESDC-03).</p>	<p>It is strongly recommended that the Proponent engage with the ISET service delivery providers and offer information sessions pertaining to the project. The Proponent could share the scope and details pertaining to the Project activities (e.g., type and number of jobs, timelines, and any other relevant information) with ISET agreement holders, so that training partners can work to prepare their clients to be ready to access these jobs.</p>	<p>That a recommendation be added to engage with employment and training organizations (e.g. ISET) that serve Indigenous people so that the scope and details pertaining to the Project activities, such as type and number of jobs, timelines, and any other relevant information, be shared with the surrounding Indigenous communities, and so that training partners can work to prepare their clients to be ready to access these jobs.</p> <p>ISET agreement holders can provide information on the labour force/potential employees, given they are largely aware of individuals who have already been trained or</p>

			<p>There are 24 Indigenous service delivery organizations in BC. There could be a potential partnership between one or more of the existing Indigenous service delivery organizations related to the Project activities to support local labour-force participation related to the Project.</p> <p>The closest ISET service delivery organization in relation to the project is Prince George Nechako Aboriginal Employment and Training Association (PGNAETA).</p> <p>For ISET service delivery organizations in BC, visit: <a href="#">Get the skills and training you need by finding your local Indigenous service delivery organization - Canada.ca</a></p>	who could be trained to access these jobs.
<b>ESDC-05</b>	<b>9.2</b>	JX LNG has identified First Nations-owned companies through consultations with Mcleod Lake Indian Band and Nak'adzli Whut'en (pp. 65-66).	The commitment to employing First Nations companies is missing. Doing so would encourage meaningful Indigenous participation in the Project's workforce while at the same time support Indigenous entrepreneurship.	Nak'adzli and Mcleod Lake Indian Band provided First Nations-owned companies to JX LNG as potential contractors. However, a commitment to employing First Nations companies is missing and should be encouraged.



<p><b>ESDC-06</b></p>	<p><b>12.1</b></p>	<p>“The Project is located in Central BC in electoral area G, Crooked River-Parsnip of the Regional District of Fraser Fort-George (RDFFG). Most of the population in this district is concentrated in the Prince George census agglomeration (92.3%)” (p. 75).</p> <p>The primary economic industries in the Prince George area include “forestry, recreation, mining, oil and gas and recreational and subsistence hunting and fishing” (p. 76).</p> <p>“Major employers in Prince George include the Northern Health Authority, School District No. 57, Government of British Columbia, University of Northern British Columbia, College of New Caledonia, and Canfor” (p. 76).</p>	<p>The report is missing and could provide socio-demographic characteristics of the economic sector workforce of the Project, including:</p> <ul style="list-style-type: none"> <li>- age distribution of the local population;</li> <li>- proportion who have the skills to contribute to the construction effort;</li> <li>- local employment rate, participation rate, and average employment income;</li> <li>- statistics for groups that are underrepresented in the labour market; and</li> <li>- a comparison with provincial averages.</li> </ul>	<p>The report describes the location/geography of the site and local industry, but it is missing socio-demographic characteristics of the economic sector workforce of the Project. These statistics would help to assess the states of the local economy and labour market, and how the Project would impact or improve them. It would also help to evaluate the extent to which the local workforce could contribute to the construction and operation of the proposed facility.</p> <p>A future iteration of the Project description could add: age distribution of the population in Prince George and surrounding areas; the most recent local employment and participation rates, as well as average employment income, and compare these to the provincial average. If possible, data should be provided concerning the local population and labour market status of groups that are underrepresented in the labour market, such as women, youth, Indigenous peoples, members of racialized populations, and persons with a disability.</p>
<p><b>ESDC-07</b></p>	<p><b>12.3</b></p>	<p>During construction, there is likely to be 400-550 workers onsite (p. 77). The report mentions “GBA Plus”-related initiatives and efforts made to hire local workers including Indigenous workers “to the extent possible” (p. 77).</p>	<p>The following issues are not addressed:</p> <ol style="list-style-type: none"> <li>1. What types of skills and knowledge could be required to support the completion of the project?</li> </ol>	<p>Issues related to employment and training regarding the Project’s workforce, including First Nations, needs to be addressed. This will ensure an accurate representation of the community’s workforce.</p>

			<p>2. What are the employment barriers to participation for local under-represented groups?</p> <p>3. Would there be a target percentage for an Indigenous workforce?</p> <p>4. Would members of First Nations within the area of the community profile receive employment opportunities prioritized over those outside of this area? If so, would Indigenous employment opportunities be proportional to either First Nation membership, or to that of the off/on-reserve population?</p> <p>5. Would Indigenous peoples residing within the area of the community profile, but with membership to First Nations outside the community profile, receive equal employment opportunities?</p> <p>6. In the absence of fully qualified local residents, is there any consideration made to facilitate training for candidates?</p> <p>7. If training for candidates is provided, would Indigenous people or members of the identified First Nations within the</p>	
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			area of the community profile receive priority?	
<b>ESDC-08</b>	<b>12.3</b>	<p>The Proponent notes that “efforts will be made to recruit local workers (not excluding age, ethnicity, education, religion, disability, gender) and Indigenous workers to the extent possible” (p. 77). Given the disproportionate impacts experienced by women when childcare is not available, it is important to note what efforts would be made to ensure access to childcare as part of the socio-economic considerations.</p> <p>Additionally, should the workforce for this Project include a significant number of out-of-area workers, the Proponent should propose mitigation measures to ensure sufficient supports for parents on the Project. It is recommended that baseline information on childcare be collected as part of understanding existing and potential impacts of the Project to the surrounding community.</p>	Early learning and childcare are primarily provincial/territorial jurisdiction. The Proponent could work with the relevant authorities to collect baseline information on childcare costs, need and program availability in the area.	The Proponent could work with the relevant authorities (i.e., provincial/municipal/Indigenous authorities) to collect baseline information on childcare costs, need, and program availability in the area.
<b>ESDC-09</b>	<b>12.3</b>	Few details are provided concerning efforts to recruit and train local workers and workers from groups that are underrepresented in the workforce, particularly Indigenous peoples.	<p>Details that could be added include:</p> <ul style="list-style-type: none"> <li>- Efforts to recruit and train local and Indigenous workers.</li> </ul>	Information concerning efforts to recruit and train local and Indigenous workers would help to assess the Project’s impact on the local economy.
<b>ESDC-10</b>	<b>12.3</b>	What proportion of employment would be full time, and what proportion would be part time?	State how many workers would be working full time and part time.	Since full-time employment is normally of higher quality than part-time employment, this information would be helpful in assessing the Project’s benefits.
<b>ESDC-11</b>	<b>12.3</b>	How does the employer intend to assist workers who will be laid off when the facility is decommissioned, or earlier, if economic conditions deteriorate or natural gas is replaced by renewable sources of energy?	Specify what assistance will be provided to laid-off workers, including severance pay, training, relocation assistance, an offer of employment elsewhere, or an early retirement package.	Given that layoffs are inevitable over the lifecycle of the Project, the Proponent should prepare for them and state what assistance will be provided to the employees affected by the layoffs.

<b>ESDC-12</b>	<b>12.6</b>	What is the total direct, indirect, and induced employment to be created locally according to each phase of this Project?	Estimate job creation by type of job that can be traced to this facility.	Job creation is a major consideration when determining the socio-economic impact of any Project. The report could provide additional details on job creation.
<b>ESDC-13</b>	<b>12.6</b>	How would this project positively impact Indigenous peoples in the region?	Provide more information as to how the facility would improve the labour market situation of Indigenous peoples, such as through training programs and recruitment.	Improving the labour market experiences of Indigenous peoples is a priority. The Proponent is expected to describe how this facility would contribute to achieving this goal.

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