Federal Authority Advice Record (FAAR)

FAAR Response must be submitted by August 12, 2024

Big Bear Camp Aerodrome Project - Big Bear Contracting Ltd.

Registry File: 88735

Department/Agency	Indigenous Services Canada (ISC)
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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.

Indigenous Services Canada (ISC) will not be required to exercise a power or perform a duty or function related to the Project as it is not responsible for approving or issuing licences, permits or authorizations for the assessments of large, proposed projects.

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.

ISC does not anticipate to exercise a power or perform a duty or function related to the Project.

2. Is your department or agency in possession of specialist or expert information or knowledge in its area of expertise that may be relevant to the conduct of an impact assessment of the project?

Yes

Specify the specialist or expert information or knowledge.

Indigenous Services Canada has a mandate to support Indigenous people (First Nations, Inuit and Métis) in their efforts to improve social well-being, health and economic prosperity; to develop healthier, more sustainable communities; and to participate more fully in Canada's political, social and economic development.

Indigenous Services Canada also has information and knowledge of Indigenous matters on Federal lands.

The mandate of the First Nations and Inuit Health Branch (FNIHB) of Indigenous Services Canada is to ensure the availability of, or access to, health services for First Nations on-reserve and Inuit communities; to help First Nations and Inuit communities overcome health barriers and disease threats, and achieve levels of health comparable to other Canadians living in similar locations; and to build strong partnerships with First Nations and Inuit to improve health services. FNIHB works with a wide range of programs, services and partnership initiatives to improve health outcomes for First Nations and Inuit.

FNIHB provides specialized information and knowledge pertaining to/tailored to onreserve First Nations and Inuit in Canada, such as:

- · the provision of health services;
- community health and wellness programs;
- Determinants of health (such as drinking water quality, food safety/chemical contamination of traditional foods or the perception of contamination, mental health and addictions, language, diet, and cultural identity).

FNIHB may also hold knowledge/information, which would vary from community to community on:

- Community level demographics
- Health status of First Nations
- The state of housing, public facilities and care facilities on reserves including state of food facilities
- Health promotion and disease prevention activities
- 3. Has your department or agency considered the project; 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?

Specify.

ISC has not 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.

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)

Provide an overview of the information or advice exchanged.

To the best of its knowledge, ISC has had no previous contact or involvement with the proponent or other parties in relation to the project.

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

ISC does not have any additional knowledge in these aspects.

6. Based on the mandate and area(s) of expertise of your department or agency, what are the key issues related to the project?

For each key issue:

- Describe the potential effect or the nature of the issue, including any relevant context;
- Provide the rationale and/or evidence for why it is a key issue;
- Provide advice on how to address the issue, including any information or studies that should be required in the Tailored Impact Statement Guidelines, potential mitigation measures, and/or regulatory requirements relevant to the issue;
- Provide a concise, plain-language summary of the issue for inclusion in the Summary of Issues.

The information provided will be considered by the Impact Assessment Agency of Canada (IAAC) and may be used to inform its decision on whether an impact assessment is required and, where appropriate, for next steps in the impact assessment process including to develop project-specific draft Tailored Impact Statement Guidelines.

Please use Table 1 to respond to this question.

See Table 1

- 7. Where possible, identify any additional information the proponent could include in the response to the Summary of Issues and, if IAAC requires it, in their Detailed Project Description, that would:
 - Give confidence that minor issues or effects could be addressed and managed by clear measures, existing guidelines, other regulatory processes or other existing tools;
 - Inform the decision as to whether an impact assessment is required; or
 - Aid in tailoring the Tailored Impact Statement Guidelines, if IAAC decides an impact assessment is required.

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

Please use Table 2 to respond to this question.

See Table 2

Angela Baier Name of Departmental / Agency

Responder

Senior Environment Officer, Lands and Economic Development Sector, Saskatchewan Region

Title of Responder

August 12, 2024

Table 1: Key Issues to inform the impact assessment process

The IAAC asks that federal authorities align expert advice with IAAC's approach to tailoring by project, which focuses on key project issues, clearly focused on the prevention of adverse effects within federal jurisdiction. In identifying key issues, federal authorities should be mindful of the project's context (size, scope, location), Indigenous Knowledge and perspectives, and public concerns. Key issues that may be relevant to the decision include:

- adverse effects within federal jurisdiction and direct or incidental adverse effects that may be to some extent significant, based on federal experts' knowledge and experience with past projects;
- potential impacts on Indigenous Peoples and their rights, based on Indigenous Knowledge and perspectives or experience with past projects;
- effects on key species or habitats (e.g. at risk, important to Indigenous communities, commercial importance, provide important ecosystem function);
- issues or effects that may result from novel project activities, components or technology;
- effects with large uncertainties, including in the effectiveness of mitigation measures;
- adverse effects within federal jurisdiction or direct or incidental adverse effects where mitigation measures are limited;
- positive effects, including where project may support other governmental priorities, including reconciliation with Indigenous Peoples; and
- key concerns raised by Indigenous groups or local communities.

Effects that are anticipated to be minor or which can be managed using well understood mitigation, existing guidance, and/or other regulatory processes may have simplified information requirements or may be removed entirely. Measured advice from federal authorities on key issues and solutions —and on the scope and detail of any required information and studies — will enable IAAC to focus assessments on issues that are important to participants and to decision-makers.

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
Please identify comments by organization and comment number. e.g.: IAAC-01	If the comment is related to a specific section of the Initial Project Description, please include that reference.	Identify valued component(s) or factor to consider—within the mandate of your department or agency—to which the potential effect or issue applies.	Provide a brief description of the issue and rationale for being a key issue. Include, where relevant: • the pathway of effects; • relevant context on why it is a key issue; • key uncertainties that should be addressed in the impact assessment; • Indigenous or public concerns or perspective; • potential for differential effects among diverse subgroups; • scientific evidence or Indigenous Knowledge, including from past project experience, which supports inclusion as a key issue.	 Where applicable, briefly provide solutions on how to address the potential issue or effects including: Information or studies required to describe and characterize the potential effect; including any guidance for data collection and/or analysis or existing data sources to inform the assessment; Any means, including any powers, duties or functions, that your department or agency has that may mitigate, manage, or set conditions related to the issue or effect; Guidance or policies for mitigating effects or any standard and well-understood mitigation measures that would address the effect, including follow-up monitoring activities; and/or Commitments the proponent could make to respond to the issue. Where available, please refer to existing text in the Tailored Impact Statement Guidelines template. 	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.
ISC-SK-01	2.4 Indigenous Engagement	Key issues/concerns raised by Indigenous communities	The Initial Project Description (IPD) notes that engagement with Indigenous groups has commenced; however, at the time that the IPD was prepared, responses had not been received from a number of Indigenous groups engaged by the proponent. Consequently, the IPD does not provide any description of potential issues, concerns or benefits of the project expressed by Indigenous communities, other than the Clearwater River Dene Nation and Clearwater Clear Lake Metis Region, Metis Nation - Saskatchewan. There is not enough information provided in the IPD to comment on key issues that may be relevant to ISC's mandate in this regard.	Recommend the proponent include additional details regarding the issues raised by Indigenous communities (e.g., changes to environmental, health, social, and economic conditions), which would allow reviewers to determine the specific aspects of valued components potentially impacted by the project.	Provide a summary of potential issues, concerns, and/or benefits of the project that have been expressed by Indigenous communities through Indigenous engagement efforts.
ISC-FNIHB-01	2.4 Indigenous Engagement	Indigenous Engagement	On page 52 of the IPD, the proponent states they are "not aware of any other First Nations that utilize the Project area for traditional uses". When referring to Table 2.4, only Clearwater River Dene Nation (the Nation who owns Big Bear Contracting Ltd.) has provided formal support for the project. Clearwater Clear Lake Metis Region, Metis	Recommend the proponent engage with all potentially impacted Indigenous communities on the project.	The proponent should engage with all Indigenous communities who may be positively or negatively impacted by the

Nation – Saskatchewan has responded to the project notification letter and shared that they do not have any comments at this time. The remaining First Nations communities that received a project notification letter have not responded. As a result, the proponent should not assume that other Indigenous communities do not use the project area	Recommend the proponent expand upon the potential impact of the project to Indigenous Peoples. For example: • The cumulative impacts of industrial development and resource extraction in	project or have interests in the project area.
for traditional or cultural activities or have an interest in the project area without receiving a formal response. It is noted that Athabasca Chipewyan First Nation (ACFN) is the closest community to the project. We recommend that Mikisew Cree First Nation, Fort McKay First Nation, Fort McMurray 468 First Nation, Chipewyan Prairie First Nation, Fort Chipewyan Métis, Fort McKay Métis and McMurray Métis, due to their close proximity to ACFN, be engaged on the project. The proponent should do their own investigation to ensure all Indigenous communities potentially impacted by the project are included in engagement opportunities. It is unclear if these communities have traditional territories that overlap with the project area.	northwestern Saskatchewan and northeastern Alberta, as the aerodrome is intended to facilitate the expansion of mining exploration and development. The potential increase of drugs and alcohol in northwestern Saskatchewan and northwestern Alberta. The potential impacts to hunting, trapping, fishing and gathering in the project area, which would have impact on food insecurity.	

Please insert additional rows as necessary.

Table 2. Clarifications or additional information the Proponent could include in the response to Summary of Issues

Comment ID	Relevant section of the Initial Project Description	Description of Issue, Concern or Uncertainty	Clarification or additional information	Plain language summary for inclusion in Summary of Issues
Please identify comments by organization and comment number. e.g.: IAAC-01	If the comment is related to a specific section of the Initial Project Description, please provide a reference. You may also choose to copy the relevant text here.	Provide a description of the issue, concern or uncertainty the proponent could address in their response to Summary of Issues and, if IAAC requires it, in their Detailed Project Description that would give confidence that the issue will be addressed and managed, by clear measures, existing guidelines, regulatory processes or other existing tools, and thus be the subject of simplified information requests in the guidelines, or simply be removed.	Provide recommended clarification or additional information to be included in their response to the Summary of Issues and, if IAAC requires it, in their Detailed Project Description to address the issue, concern or uncertainty, for example: • Clarifications to elements of the project description (e.g. components, activities, locations or alternatives); • Proposed project design changes that could avoid effects; • Evidence that could be presented to demonstrate there is no effect, pathway of effect or that effects would be negligible; • Evidence that standard mitigations will address potential effects • Commitments the proponent could make to respond to the issue, including the implementation of federal operational policies or guidance documents.	For issues to be included in the Summary of Issues, provide a concise, plain language synopsis of the issue and of the question or direction for the proponent.
ISC-SK-02	3.1 Project Purpose and Need 4.3 Health, Social, and Economic Context 6.4 Effect to the Health, Social or Economic Conditions of Indigenous Peoples	The IPD states that one of the purposes of the project is "to provide economic growth and employment opportunities for the local communities, including Indigenous groups", and that the project is "is expected to have a positive effect on the economic conditions for the surrounding Indigenous communities as it will offer a form of employment and income"; however, the IPD does not provide employment or economic statistics for the Clearwater River Dene Nation or other Indigenous communities.	Recommend the proponent summarize and provide social and economic data that includes metrics specific to Indigenous peoples and communities in the region to provide details surrounding how and what opportunities could be provided to Indigenous communities specifically with regards to employment, contracting, and the procurement of goods and services. Potential sources for Indigenous community information include: The Community Well-Being Index (https://www.sac-isc.gc.ca/eng/1100100016579/1557319653695) First Nation Profiles (https://fnp-ppn.aadnc-aandc.gc.ca/fnp/Main/Index.aspx?lang=eng)	The proponent should expand on the social and economic contexts to include information on demographic characteristics of Indigenous communities (such as: social characteristics, education, workforce, population/gender make-up, baseline health and economic data, available infrastructure – social services, etc.). The proponent should provide details on strategies to promote employment, training, and economic opportunities to Indigenous communities.
ISC-SK-03	4.1.4 Project Proximity to Traditional Indigenous Uses	The IPD states that the Project is located on the traditional territory of the Clearwater River Dene Nation (CRDN). The boundaries of CRDN's traditional territory were provided by the Nation for inclusion in the IPD and are shown in Figure 4.2. According to the IPD, other traditional territories in the area include Buffalo River Dene Nation, Birch Narrows Dene Nation, Black Lake Denesuline First Nation, Fond du Lac Denesuline First Nation, and Athabasca Chipewyan First Nation; however, the IPD does not provide the boundaries of these territories.	Recommend the proponent include information that clearly illustrates the project's proximity to land used for traditional purposes by Indigenous peoples of Canada.	The proponent should update Figure 4.2 to illustrate the project's proximity to the traditional territories of Buffalo River Dene Nation, Birch Narrows Dene Nation, Black Lake Denesuline First Nation, Fond du Lac Denesuline First Nation, and Athabasca Chipewyan First Nation in addition to the Clearwater River Dene Nation, as well as other Indigenous communities

				in close proximity to the project.
ISC-SK-04	6.3 Impact to Indigenous Peoples	The IPD includes a discussion on the handling of heritage resources, identifying these as "pre-contact period and historic period archaeological sites, built heritage sites, structures of historical and/or architectural interest, and paleontological sites". Correspondence from the Saskatchewan Ministry of Parks, Culture and Sport summarized on page 50 of the IPD states that there are no known archaeological sites located in potential conflict with the proposed project; however, the aerodrome and ancillary components will impact terrain known to have moderate to high potential to contain intact heritage resources. The proponent has acknowledged the Province of Saskatchewan's requirement for a Heritage Resource Impact Assessment (HRIA) for the entire project area. The IPD states that "Big Bear camp will conduct an HRIA prior to construction and will have a chance find protocol in place. CRDN will be informed of all findings." It is not clear if and how potentially affected Indigenous groups other than CRDN would be notified or consulted in the event that items of historical, archaeological, paleontological, or spiritual significance to Indigenous groups are encountered during the HRIA or by chance during construction activities.	Recommend the proponent include a description of the process for notifying Indigenous groups and how Indigenous groups will be consulted on the mitigation measures in the event items of historical, archaeological, paleontological, or spiritual significance to Indigenous groups are encountered.	The proponent should describe how Indigenous groups will be notified and consulted in the event that items of historical, archaeological, paleontological, or spiritual significance to Indigenous groups are discovered.
ISC-FNIHB-02	3.1 Project Purpose and Need 3.6 Potential Alternatives 6.4 Effect to the Health, Social or Economic Conditions of Indigenous Peoples	In the IPD, the proponent states that the project will have positive health impacts. However, it is unclear whether these positive impacts will solely benefit the private companies who use the Big Bear Camp or if these impacts will benefit Indigenous communities in northwestern Saskatchewan and northeastern Alberta. We recommend the proponent provide additional information on: • The medical flights and emergency medical services currently available within the region. The proponent should clearly explain how the project could have positive impacts to healthcare access for Indigenous communities in northwestern Saskatchewan and northeastern Alberta. • How the proposed aerodrome could be used for emergency evacuations and wildfire management and services. • The health benefits of year-round access to the Big Bear Camp and flights. The IPD states that the project will fill a niche similar to that of Points North Landing in northeastern Saskatchewan. The proponent should consider the successes, challenges and lessons learned from Points North Landing and integrate them into the design and operation of this project. The proponent should demonstrate how the project could have positive impacts to the healthcare system in northwestern Saskatchewan and northeastern Alberta.	Recommend the proponent explain how this project may enhance access to healthcare for Indigenous communities in northwestern Saskatchewan and northeastern Alberta. Recommend the proponent include information on medical flights and emergency medical services currently available at the Big Bear Camp and how these could be enhanced by the project. Recommend the proponent expand upon the potential positive impacts the project could have in regard to emergency evacuations, wildfire management and services, and year-round access to the Big Bear Camp. Recommend the proponent consider the successes, challenges and lessons learned from Points North Landing in northwestern Saskatchewan.	The proponent should include information on the potential positive impacts of the project, such as increased access to medical and emergency services. The proponent should consider the successes, challenges and lessons learned from Points North Landing.
ISC-FNIHB-03	3.1 Project Purpose and Need 3.3.2 Existing Infrastructure	It is unclear what existing projects are or future projects may be located in northwestern Saskatchewan and use the Big Bear Camp. In addition, the infrastructure needs of the Big Bear Camp and region are unclear.	Recommend the proponent provide a stronger justification for the project. If the project is to be approved and implemented,	The proponent should provide information on what projects/companies use the Big Bear Camp.
	4.3.1 Health Context	Page 12 of the IPD states "service the expanding needs of the mining industry both for exploration projects and the proposed mining projects in the area".	what additional infrastructure is required on site? For	,

		We recommend the proponent provide more information on the projects/companies that currently use the Big Bear Camp and explain why the expansion is necessary (e.g., it is expected that in the next 5-10 years an additional 100-200 temporary and permanent workers will be housed and transported regionally via the Big Bear Camp). Furthermore, it is our understanding that the majority of employees or individuals who will be accessing the Big Bear Camp are Indigenous (First Nation or Métis), therefore we must ensure there is adequate first aid and medical supplies available on site; in case of accidents and injuries. The IPD stated that the closest health centre is 176km away, therefore first aid and medical supplies must be available on site to treat minor injuries or sustain an individual until they can be transported to a health centre/hospital. The IPD does not include information on the health facilities or services located on site.	example, dormitories, kitchens, storage facilities, health facilities, water treatment plant, etc. Recommend the proponent consider the first aid and emergency preparedness needs of the Big Bear Camp.	The proponent should include information on the first aid and emergency preparedness needs of the Big Bear Camp.
ISC-FNIHB-04	3.3.1 Proposed New Infrastructure and Project Activities	ISC-FNIHB deems there is missing information in this section. We suggest the proponent answers the following questions: • Will the workforce for the construction of the aerodrome be housed in the existing dormitories or does new infrastructure need to be built? • Is there local capacity to fill temporary and permanent positions? • Will these positions be filled by members of Clearwater River Dene Nation? If not, will these positions be offered to other Indigenous communities in the region? If the construction workers are sourced from outside of the community, it is crucial to address concerns about transient workers. These include an increased demand for services and infrastructure, and violence against Indigenous women and girls. Employment is a social determinant of health. When Indigenous Peoples have meaningful employment it can have beneficial impacts to health outcomes, such as access to healthcare, access to appropriate housing, better nutrition, and increased health equity (National Collaborating Centre for Aboriginal Health). References: Native Women's Association of Canada. 2018. Indigenous Gender-based Analysis for Informing the Canadian Minerals and Metals Plan. https://internationalwim.org/wp-content/uploads/2020/07/indigenous-gender-based-analysis-cmmppdf National Collaborating Centre for Aboriginal Health. 2017. Employment as a Social Determinant of First Nations, Inuit, and Métis Health. https://www.ccnsa-nccah.ca/docs/determinants/FS-Employment-SDOH-2017-EN.pdf	Recommend the proponent include information in the Detailed Project Description about the temporary workforce, temporary housing, and Indigenous hiring opportunities for the construction and operation of the project. Recommend that the proponent continue ongoing engagement with the Indigenous communities that may be impacted by the project to minimize the impacts to safety of Indigenous women, minors and the elderly.	The proponent should include information on where the workforce for the construction and operation of the project will come from. The proponent should engage with Indigenous communities to minimize the health and safety impacts to Indigenous women and vulnerable populations.
ISC-FNIHB-05	4.1.4 Project Proximity to Traditional Indigenous Uses 6.3 Impact to Indigenous Peoples	The IPD lacks information on the potential impacts the project could have on the food security of Indigenous Peoples. The World Bank defines food security as the state in which all individuals consistently have physical and economic access to sufficient safe and nutritious food that meets their dietary needs and preferences, promoting an active and health life (World Bank, 1996). Food insecurity is a continuing public health challenge effecting Indigenous Peoples (Power, 2008). The First Nations Food, Nutrition and Environment Study found that 37% of First Nations households in Saskatchewan were classified as food insecure (FNFNES SK, 2015). The proponent should consider the potential positive and negative impacts the project could have on food security. For example, positive impacts could include greater access to harvested or	Recommend the proponent include information on the potential positive and negative impacts of the project on food security. Recommend the proponent provide information on: • The potential impacts to traditional and cultural activities (e.g., hunting, trapping, fishing, gathering).	The proponent should include information about potential positive and negative impacts to food security. The proponent should review the results of the First Nations Food, Nutrition and Environment Study in Saskatchewan.

		storebought foods. Whereas negative impacts could include the disruption of natural habitat or migration routes for species of cultural significance. References: World Bank. 1996. What is Food Security? https://www.worldbank.org/en/topic/agriculture/brief/food-security-update/what-is-food-security Power, E.M. 2008. Conceptualizing Food Security for Aboriginal People in Canada. doi: 10.1007/BF03405452. First Nations Food, Nutrition and Environment Study. Results from Saskatchewan 2015. https://www.fnfnes.ca/docs/FNFNES_Saskatchewan_Regional_Report_English_2020-01-28.pdf	The preferred hunting, trapping, fishing and gathering locations of Indigenous Peoples located in the region. Recommend the proponent review the results of the First Nations Food, Nutrition and Environment Study in Saskatchewan.	
ISC-FNIHB-06	4.2.4.2 Groundwater and Water Quality 6.7.2 Water	It is our understanding that drinking water for the Big Bear Camp is obtained from Grygar Lake, as stated on page 63 "Big Bear Camp currently holds a license to pull water from Grygar Lake and treat it at their on-site water treatment plant". We recommend the proponent develop a contingency plan in case an accidental release or chemical spill into Grygar Lake occurs from aerodrome operations. This will ensure that clean water is available on site for consumption, food preparation and hygiene purposes.	Recommend the proponent develop a contingency plan in case of an accidental release or chemical spill into Grygar Lake to ensure continuous access to clean water on site.	The proponent should develop a contingency plan to ensure continuous access to clean water on site.
ISC-FNIHB-07	4.3.2 Social Context	ISC is responsible for providing programs and services to Indigenous Peoples to address the environmental, health, and socio-economic conditions in their communities. To do so, demographic information is necessary for decision-making and designing meaningful operational plans and policies. There is a lack of demographic information regarding the Indigenous communities that may be impacted by the project. Not all Indigenous communities in close proximity to the project were considered, such as, but not limited to, Mikisew Cree First Nation, Fort McKay First Nation, Fort McMurray 468 First Nation, Chipewyan Prairie First Nation, Fort Chipewyan Métis, Fort McKay Métis, and McMurray Métis. Where possible, the proponent should include disaggregated data (e.g., age, sex, gender, level of education, employment by sector).	Recommend that the proponent include demographic information about Indigenous groups that may be impacted by the project. Resource: First Nation Profiles	There is a lack of demographic information about the Indigenous communities that may be impacted by the project. The proponent should include demographic information about the Indigenous communities that may be impacted.
ISC-FNIHB-08	4.3.2 Social Context 6.3 Impact to Indigenous Peoples 6.4 Effect to the Health, Social or Economic Conditions of Indigenous Peoples	The proponent should consider the potential positive and negative health impacts of the project on Indigenous youth (up to age 30). On page 43 of the IPD states that "Both La Loche and CRDN have predominantly young populations" and "The majority of the population is Indigenous". This project should not exacerbate existing social and health conditions of Indigenous youth in northwestern Saskatchewan and northeastern Alberta. Potential positive impacts of this project could include meaningful and stable employment and culture camps for Indigenous youth. Whereas potential negative impacts could include increased access to drugs and alcohol and increased human trafficking.	Recommend the proponent consider the potential positive and negative health impacts of the project on Indigenous youth in northwestern Saskatchewan and northeastern Alberta.	The proponent should include information on the positive and negative health impacts of the project on Indigenous youth.

Please insert additional rows as necessary.