

**Federal Authority Advice Record (FAAR)**

**FAAR Response must be submitted by October 11, 2024**

Rocky Creek Metallurgical Coal Project – CTI Plus Resources Ltd.

Registry File: [88867]

Department/Agency	Women and Gender Equality Canada (WAGE)
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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 .

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.

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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?

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).

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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?

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)

No.

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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)?

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%20Thiesse n.%20Gender%20Diversity%20in%20IA.Feb%208%202019.pdf)
- <https://research-groups.usask.ca/reed/documents/CEAA%20Report.FINAL.%20Walker%20Reed%20Thiesse n.%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](https://www.ec.gc.ca/iaac/impacts/assessment-agency-of-canada-research-program)

**WAGE:**

- [Take the Gender-based Analysis Plus course - Women and Gender Equality Canada](https://www.womenandgenderequality.ca/courses/gba-plus)
  - [What is gender-based violence? - Women and Gender Equality Canada.](https://www.womenandgenderequality.ca/what-is-gender-based-violence)
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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 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.

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7. Where possible, identify any additional information the proponent could include in their 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.

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Women and Gender Equality Canada

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Name of Departmental / Agency  
Responder

Director

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Title of Responder

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October 4, 2024  
Date

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

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
<p>Please identify comments by organization and comment number.</p> <p>e.g.: IAAC-01</p>	<p>If the comment is related to a specific section of the Initial Project Description, please include that reference.</p>	<p>Identify valued component(s) or factor to consider—within the mandate of your department or agency—to which the potential effect or issue applies.</p>	<p>Provide a brief description of the issue and rationale for being a key issue.</p> <p>Include, where relevant,:</p> <ul style="list-style-type: none"> <li>• the pathway of effects;</li> <li>• relevant context on why it is a key issue;</li> <li>• key uncertainties that should be addressed in the impact assessment;</li> <li>• Indigenous or public concerns or perspective;</li> <li>• potential for differential effects among diverse subgroups;</li> <li>• scientific evidence or Indigenous Knowledge, including from past project experience, which supports inclusion as a key issue.</li> </ul>	<p>Where applicable, briefly provide solutions on how to address the potential issue or effects including:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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</li> <li>• Commitments the proponent could make to respond to the issue.</li> </ul> <p>Where available, please refer to existing text in the Tailored Impact Statement Guidelines template.</p>	<p>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.</p>
WAGE-01	Acronyms and Abbreviations	GBA Plus Terminology	On pgs. xxvi and 50 the acronyms/terms “GBA” and “GBA Plus Analysis” are used, respectively. It is important to include the “Plus” and the second analysis can be omitted – otherwise it is Gender-based Analysis Plus analysis.	GBA Plus is the correct and most up-to-date term.	Use the terminology “GBA Plus.”
WAGE-02	<b>4.3 Project Workforce</b> , 25.	Social and economic conditions and disaggregated data	<p>The predicted number of personnel in <b>4.3 Project Workforce</b> is identified as approximately 243 persons. The workforce is expected to draw skilled labour from Chetwynd (the closest municipality to the Project footprint at 47km away), the Tumbler Ridge area, and speciality support services from wider regions including Dawson Creek and Fort St. John (pgs. 25, 46).</p> <p><b>Section 7.3.5 Socio-Economic Conditions</b> has identified the employment rate. For example, 11% of the labour force in Chetwynd is employment by mining, quarrying, and oil and gas industries, Tumbler Ridge at 37% in the same industry, and so on (p.60).</p>	<p>WAGE recommends that the proponent provides further detail regarding the employment and workforce (and positive economic benefits as a result) of the proposed project.</p> <p>Should an Impact Assessment be required, note that as per the <a href="#">TISG</a> 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>To take into consideration a GBA Plus approach.</p> <p>Proactive and mitigating measures related to employment should be developed early in the project cycle.</p>

			<p>The IPD does not discuss <i>how</i> the Project will commit to hiring local and Indigenous contractors or how workplace policies and programs for local and Indigenous employment (and employment of other underrepresented groups) will be established throughout the lifecycle of the project. It is unclear how GBA Plus will be applied to the hiring and retention processes. How does the Proponent intend to train or hire new workers from the Tumbler Ridge area (for example) as 37% are <i>currently</i> employed in the same industry?</p> <p>Establishing a strong baseline study on the impacted demographics will aid the Proponent to accurately assess project impact - including social and economic impacts (negative and positive) - on the community and various population groups (including Indigenous persons) throughout the lifecycle of the Project. This data will help address Indigenous interests listed throughout the IPD, especially changes to socio-economic status and worker accommodations (pgs. xx, xvi)</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>	
WAGE-03	<b>Section 7.3.5 Socio-Economic Conditions, 59.</b>	Social and economic conditions and disaggregated data	<p>There is a lack of disaggregated data to support or establish a baseline for the identified Nations and/or municipalities.</p> <p><b>Table 10-1 Potential Project Interactions:</b> Project construction and operation (overview) identifies 'community health and well-being' as a possible interaction. As a result, the Proponent should include more comprehensive and disaggregated data (while abiding by privacy regulations) of identified populations and communities (e.g., age, sex, location [on reserve vs. off reserve] etc.).</p>	<p>Should an Impact Assessment be required, note that as per <b>Section 10.1.1. Community Profile</b> of the <a href="#">TISG template</a>, the Impact Statement must prepare community profiles and describe influences on community well-being, including indicators by Indigenous groups.</p> <p>WAGE advises the Proponent to examine and include the Indigenous Population Profiles from the 2021 census, which are available on the Statistics Canada website. This data should be analyzed to examine the project's impact on specific subgroups and ensure GBA Plus in the planning phase of the project.</p> <p>As per <b>section 12.3 Health, social and economic conditions of Indigenous peoples</b> of the <a href="#">TISG</a> template, it is best practice to provide community-specific social and economic conditions on a disaggregated basis (without identifying individuals).</p> <p>WAGE recommends that the Proponent consider how different populations within the participating Indigenous Nations (women, children, (dis)abled, etc.) might be affected by the Project-social interactions.</p> <p>WAGE recommends adding social impacts, as transient, male-dominated workforces can have adverse social impacts in communities, particularly for young and Indigenous women.</p> <p>It would be helpful to include some preliminary mitigation measures for GBV to "Indigenous Health, Social, and Economic Conditions" (pg. 78). Monitoring is also essential to assess if the mitigation measures are having an impact on the population.</p> <p>Potential indicators of mitigation measures could include policies, including strict enforcement of Code</p>	<p>To take into consideration a GBA Plus approach.</p> <p>Inclusion of disaggregated data.</p> <p>Inclusion of potential GBV risks.</p>

				<p>of Ethics, Respectful Workplace, and Drug and Alcohol Policies, to establish clear expectations for ethical behaviour, and to maintaining open dialogue and regular communication, including robust workplace education and sensitivity training. Enforcement must include real consequences for harassing or violent behaviour. (<a href="#">Source: IAAC's GBA Plus Guidance</a>).</p> <p>Even if construction camps will not be required, Gender-based Violence should be included under the Health and Safety considerations of the Project within the IPD. Self-reported incidents of GBV, such as unwanted sexual behaviours in the workplace or in a public place, harassment, intimate partner violence, sexual assault (See again, WAGE's GBV page: <a href="#">What is gender-based violence?</a>).</p>	
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*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
<p>Please identify comments by organization and comment number.</p> <p>e.g.: IAAC-01</p>	<p>If the comment is related to a specific section of the Initial Project Description, please provide a reference.</p> <p>You may also choose to copy the relevant text here.</p>	<p>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.</p>	<p>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:</p> <ul style="list-style-type: none"> <li>• Clarifications to elements of the project description (e.g. components, activities, locations or alternatives).</li> <li>• Proposed project design changes that could avoid effects.</li> <li>• Evidence that could be presented to demonstrate there is no effect pathway of effect or that effects would be negligible.</li> <li>• Evidence that standard mitigations will address potential effects</li> <li>• Commitments the proponent could make to respond to the issue, including the implementation of federal operational policies or guidance documents.</li> </ul>	<p>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.</p>
WAGE-01	<b>Section 7.3.5 Socio-Economic Conditions</b>	As per WAGE-03 in Table 1, WAGE asks the proponent to include more disaggregated data for the socio-economic, workforce/employment data, GBA Plus considerations especially those identified in the IPD as close to the Project site, and inclusion of a community well-being section with appropriate health data to assess potential changes to Indigenous interests (pgs. xiv, 79).	Statistics Canada's 2021 census has some demographical information to bolster data for the identified sections. For example, <a href="#">Blueberry River Nation</a> and <a href="#">Chetwynd</a> . Due to the nature of Census collection and accurate Indigenous information, this data could be supplemented with information collected during the engagement and consultation process to help establish the baseline.	Consider including more disaggregated data related to the local Indigenous communities living close to the project location. Inclusion of disaggregated data will enable the Proponent to analyze the project's impacts on specific subgroups (including Indigenous populations) and apply GBA Plus throughout the lifespan of the project.

Please insert additional rows as 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.