

Federal Authority Advice Record (FAAR)

FAAR Response must be submitted by March 5, 2025

Shaakichiuwaanaan Mining Project – Patriot Battery Metals.

Registry File: 89271

Department/Agency	Employment and Social Development Canada (ESDC)
Lead Contact	Eva Lazar - Executive Director of Horizontal Policy and Special Projects Division (HPSPD) of the Skills and Employment Branch (SEB)
Full Address	Phase IV 140 Promenade du Portage, Gatineau, Québec K1A 0J9 Canada
Email	eva.lazar@hrsdc-rhdcc.gc.ca
Telephone	1-613-618-3484
Alternate Contact	Evelyn Cheung – Manager (HPSPD-SEB) evelyn.cheung@hrsdc-rhdcc.gc.ca

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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.

ESDC does not exercise powers, nor perform specific duties or functions related to the Project to enable it to proceed. The powers of ESDC Ministers and their duties and functions extend to and include all matters relating to human resources and skills development in Canada. This would include areas of social development in 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.

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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?

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

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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?

Specify.

No.

4. Has your department or agency had previous contact or involvement with the proponent or other party in relation to the Project? (for example: an enquiry about methodology, guidance, or data; introduction to the project)

Provide an overview of the information or advice exchanged.

No.

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)?

Specify as appropriate.

No.

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.

ESDC has developed a socio-economic checklist (enclosed) to assist proponents and the IAAC in the development and completion of Initial Project Descriptions (IPDs), Detailed Project Descriptions (DPD), and Tailored Impact Statement Guidelines (TISGs).

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.

ESDC has provided comments on the Summary IPD in the comment table below.

Eva Lazar

Name of Departmental / Agency
Responder

**Executive Director of Horizontal
Policy and Special Projects Division
(HPSPD), Skills and Employment
Branch (SEB), ESDC**

Title of Responder

March 4th, 2025

Date

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"> • 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. 	<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>
ESDC-01	<p>“The total workforce required for the Project will vary throughout its life cycle, ranging from approximately 500 workers during the construction phase to around 50 workers as operations wind down towards the end of the mine’s life.”, (p.14).</p>	<p>A more detailed timeline could be provided regarding the number of years associated with each phase of the Project’s lifecycle starting with its construction phase to its forecasted closure. This will allow for a better understanding of the timeframe within which the required workforce will be needed for each phase of the Project.</p>	<p>It is recommended that the Proponent provide a more detailed timeline regarding the number of years associated with each phase of the Project’s lifecycle.</p>	
ESDC-02	<p>“The construction phase is expected to employ a maximum of 500 workers.”, (p.14).</p>	<p>To have a better understanding of the Proponent’s workforce strategy regarding the Project’s construction, the IPD could provide more detailed information regarding the following:</p> <ul style="list-style-type: none"> - If the maximum workers for the construction phase of the Project will be full-time, part-time, or contractual employment positions; - If the Proponent will rely on the Project’s local labour force to complete the construction of the Project and whether enough workers are currently available who are sufficiently trained; - If the Proponent has considered any alternative strategies to access the required labour and provide the sufficient training for the Project’s successful completion. 	<p>It is recommended that the Proponent provide a greater degree of detail regarding the categories of workers associated with the construction phase of the Project and if a sufficiently trained workforce is currently available to ensure the Project’s completion.</p>	
ESDC-03	<p>“During the operation phase, the workforce will consist of approximately 230 workers.”, (p.14).</p>	<p>It could be indicated in the summary IPD if the Project’s local workforce is currently adequately trained to take on the key roles for supporting all operations of the Project that are outlined in Table 5 (p.14) of the summary IPD. If they are not, the Proponent could indicate that it will</p>	<p>It is recommended that the Proponent clearly indicate if the Project’s local workforce is currently adequately trained to support the Project’s operation and if not, that access to appropriate job training will be made available.</p>	

		ensure access to adequate job training for the Project's workforce to guarantee that the Project operates smoothly.		
ESDC-04	"This number will begin to decrease starting in Year 17, reflecting the mine's transition towards the closure phase.", (p.14).	An indication as to whether the Proponent has developed any employment strategies that will assist those workers who will be transitioned out of the Project in Year 17 could be indicated in the IPD; this would include how workers would acquire alternative employment through job training prior to closure.	It is recommended that the Proponent develop employment strategies that will assist workers who will be transitioned out of the Project in Year 17.	
ESDC-05	"Table 14: Potential changes to the health, social, and economic conditions of Indigenous peoples", (p.57) list the potential effects of the Project to Indigenous peoples with respect to their socio-economic conditions.	The Summary IPD could indicate how the Proponent will address each potential effect that each phase of the Project will have on the health, social and economic conditions of Indigenous peoples impacted by the Project.	It is recommended that the Proponent outline how they intend to address the potential effects of the Project on Indigenous peoples with respect to their socio-economic conditions.	

Please insert additional rows as necessary.