

Shaakichiuwaanaan Mine Project

Federal Comments on the Draft Impact Statement Guidelines

Department/Agency	Employment and Social Development Canada (ESDC)		
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Instructions:

1. Please review the sections of the draft Impact Statement Guidelines that apply to your department's or agency's mandate and expertise.
2. Using the table below, please include your recommendations on how the final Impact Statement Guidelines should be amended:
 - Please indicate any corrections, additions or deletions to be made to the text. For each recommendation, please provide a clear rationale. **For any additions, please ensure that the information is not already required and briefly explain the need for the addition.**
 - The guidelines refer to the requirements of the COMEV Directive for the same project. When IAAC refers the proponent to the COMEV Directive, IAAC expects to receive the information required in the COMEV Directive. Please read the COMEV Directive when IAAC refers to it.
 - The COMEV Directive is available on the COMEV website at: https://comev.ca/wp-content/uploads/2024-02-20_Directive_Projet-minier-Corvette.pdf
 - The guidelines should focus on key issues within areas of federal jurisdiction. Please consider the context of the project and build on the elements contained in the [initial project description](#) and the [proponent's responses to the summary of questions](#).
3. Comments must be submitted by **July 19, 2025** by email to the following address: Shaakichiuwaanaan@iaac-aeic.gc.ca. All comments submitted will then be posted on the Registry website for the project (Reference Number 89271).

Shaakichuwaanaan Mining Project – Patriot Battery Metals.
Reference Number: 89271

Comment Number (e.g., ECCC-01)	Draft Joint Guidelines Section	Proposed change	Justification
ESDC-01	5.3.3 Baseline economic conditions, (pp.23-24).	“... the availability of skilled and unskilled workers, and conditions influencing workforce availability during the project timeline...”, (p.24).	The proponent could be asked to provide as much detailed information with respect to the level of education of the local Indigenous population and their level of appropriate skills set relevant to the proposed project. This would allow for a better understanding as to whether the proposed project will provide employment opportunities and economic benefits to the impacted Indigenous Peoples.
ESDC-02	5.3.3 Baseline economic conditions, (pp.23-24).	“... workforce development and training plans for Indigenous Peoples...”, (p.24).	Reference could be made here for the proponent to seek out any available federal level programs that assist Indigenous Peoples in developing the required skill set for the proposed Project, such as the following ESDC programs: Link to ISET Network: https://www.canada.ca/en/employment-social-development/programs/indigenous-skills-employment-training/service-delivery-organizations.html Skills and Partnership Fund (SPF) , which offers a mechanism to co-invest in Indigenous-led, demand-driven training programs.
ESDC-03	5.3.3 Baseline economic conditions, (pp.23-24).	“... barriers to employment and/or participation in the labor market...”, (p.24).	Specific examples could be given here as what exactly the proponent needs to provide in their Impact Statement (IS) with respect to existing employment barriers and labour market participation for Indigenous Peoples who could be impacted by the proposed project.
ESDC-04	5.4.3 Effects on economic conditions (pp.26).	“... describe potential changes in employment for Indigenous communities...”, (p.26).	The proponent could be required to outline the anticipated number of jobs that the proposed project will have for Indigenous Peoples and the specific categories of employment (part-time, full-time, short-term, long-term) associated with those jobs.
ESDC-05	5.4.3 Effects on economic	“... describe potential changes in training opportunities for Indigenous communities...”, (p.26).	Clarity could be provided here as to whether or not the proponent is to assist in providing the appropriate training opportunities

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	conditions (pp.26).		required for the proposed project to impacted Indigenous communities.
ESDC-06	5.4.3 Effects on economic conditions (pp.26).	“... estimate the capacity of the local and regional market to meet the demand for employees, and describe the potential risks of labor shortages, taking into account the different phases of the Project and other projects in the region...”, (p.26).	How the proponent intends to estimate (labour market information) any potential labour shortages, and address demands associated with the construction and operation of the Project. This would allow for a better understanding of how the proponent will address this issue in their IS.
ESDC-07	5.4.3 Effects on economic conditions (pp.26).	“... describe the situations where the Project could directly or indirectly create economic hardship or opportunities resulting from changes to the environment, such as job losses or the displacement of businesses to Indigenous communities near the site...”, (p.26).	The proponent could be required to indicate in their IS how they will address any economic hardships that evolve from the proposed project, specifically what employment strategies they intend to develop to assist Indigenous Peoples.

Insert as many lines as necessary.