



**Otipemisiwak Métis Government Supplementary Comments on the
Draft Integrated Tailored Impact Statement Guidelines:
Gender-Based Violence and Industrial Work Camps**

Energy Alberta Peace River Nuclear Power Project

October 20, 2025

Summary

This document provides comments on the Draft Integrated Tailored Impact Statement Guidelines (Document #251), put forward by the Impact Assessment Agency of Canada on June 9, 2025. The Otipemisiwak¹ Métis Government Consultation Department thanks the regulators and proponent for their engagement efforts so far, and reiterates that the Energy Alberta Peace River Nuclear Power Project (“the project”) will have impacts on the ability of Citizens of the Métis Nation within Alberta to exercise their rights as an Aboriginal people, as protected by s. 35 of the Canadian *Constitution Act, 1982*, and therefore engages the Crown’s Duty to Consult with the Otipemisiwak Métis Government.

Building on our previous submissions (Comments on the Initial Project Description (Document #250), Comments on the Draft Integrated Tailored Impact Statement Guidelines and the Draft Indigenous Engagement and Partnership Plan (Doc #376)), our priority in this submission is to highlight potential impacts – specifically related to gender-based violence – resulting from the industrial work camps required for construction of the project which should be addressed in the Impact Statement. We also present recommendations to expand the required mitigation measures to be identified in the Impact Statement in order to address those impacts, as well as measures to help ensure that Métis women can safely share in the economic benefits of the project through employment.

Overview of the Otipemisiwak Métis Government

The Métis Nation within Alberta, as governed by the Otipemisiwak Métis Government, is an Indigenous nation comprising more than 72,000 registered Citizens. Having begun organizing to advance Métis self-determination and self-government in 1928, the Otipemisiwak Métis

¹ Pronounced “*Oh-teh-peem-si-wak*”, a Cree word historically used to refer to the Métis, meaning “The people who own themselves”



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Government is the oldest continuous Métis government, and the Métis Nation within Alberta is the largest federally recognized Indigenous Nation in Canada. In 2022, the Métis Nation within Alberta voted to ratify and adopt its Constitution. This established the current Otipemisiwak Métis Government governance structures and further authorized the Otipemisiwak Métis Government to assert and advance collectively held Métis rights, claims, and interests in negotiating and arriving at agreements that advance, recognize, and respect Métis Aboriginal rights as recognized and protected under s.35 of the Canadian *Constitution Act*, 1982.

In 2023, the Otipemisiwak Métis Government and the Government of Canada signed an updated Métis Nation within Alberta Self-Government Recognition and Implementation Agreement which recognizes the Otipemisiwak Métis Government's jurisdiction over its internal and core governance matters, including Citizenship, elections, and administration. It also formalizes the Otipemisiwak Métis Government as an Indigenous governing body recognized by Canada and charts a path forward to establishing an enduring nation-to-nation, government-to-government relationship with Canada through a modern-day treaty.

Per the Métis Nation within Alberta Constitution, the Métis Nation within Alberta comprises five Territories covering the entire province. These Territories are subdivided into 22 Districts to allow for more effective and localized representation. Each District has its own Citizens' Representative on the provincial Métis Citizens' Council and may have its own District Captain and Council. Districts are empowered in the Constitution to develop their own local bylaws, implement local programming, and oversee Crown Consultation within their District.

The Consultation Department supports the Otipemisiwak Métis Government's role in Crown consultation processes in collaboration with District Councils. The Consultation Department is mandated to protect and advance the collectively held rights, claims, and interests asserted by the Otipemisiwak Métis Government as the representative and governing body of the Métis within Alberta, in accordance with the Otipemisiwak Métis Government – Canada Consultation Agreement, the Métis Nation within Alberta Constitution, and relevant domestic and international legislation, regulation, and case law.

Anticipated size of the project workforce

Energy Alberta ("the proponent") informed the Otipemisiwak Métis Government in June, 2025 that the project anticipates up to 20,000 workers during the construction phase, and up to 3,500 full-time equivalent jobs during operation.² Given that the Town of Peace River has

² Presentation in Peace River on June 18, 2025



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roughly 7,000 residents, these numbers represent a very significant transient and permanent workforce that will have transformative effects on the town and the region.

Energy Alberta has not yet provided details regarding the size, location, and design of any work camps for the project. These facilities are critical parts of the project with significant impacts on many aspects of the community and environment, from healthcare and policing to traffic and waste management. Indigenous nations such as the Otipemisiwak Métis Government must be consulted on the siting and design of the facilities, as well as the policies regulating camps and employees and the services provided for the camps and broader community by the proponent and all three levels of government.

The proponent and governments must be proactive in building supports in anticipation of these impacts rather than waiting for tax revenue to trickle into budgets while the impacts accumulate.

Intersectional Approach to Gender-Based Violence

The introduction of industrial development sites to communities often results in increased gender-based violence experienced by that community, particularly when the population of the accompanying workforce is significant.³ The Government of Canada defines gender-based violence as “violence based on gender norms and unequal power dynamics, perpetrated against someone based on their gender, gender expression, gender identity, or perceived gender. It takes many forms, including physical, economic, sexual, as well as emotional (psychological) abuse”.⁴

As previously mentioned, the project will impose a significant population of both transient (20,000) and permanent (3,500) workers onto the relatively small population of Peace River (7,000), thus introducing a significantly increased risk of gender-based violence for the Métis community in the Town of Peace River and surrounding region. In considering gender-based violence as it applies to the Métis community in and around Peace River, we must also consider

³ For a recent article summarizing some of this research, see Barnes, E. 2025. “Beyond violence: Building equity and safety in Canada's industrial energy resource work camps.” *Energy Research & Social Science*, Volume 127, September 2025, <https://www.sciencedirect.com/science/article/pii/S2214629625002749>. Also see “Reclaiming Power and Place: The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls.” https://www.mmiwg-ffada.ca/wp-content/uploads/2019/06/Final_Report_Vol_1a-1.pdf pg 584-593.

⁴ Government of Canada. “Gender-based violence glossary” <https://www.canada.ca/en/women-gender-equality/gender-based-violence/gender-based-violence-glossary.html>



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how intersectional identities of Métis persons across the gender spectrum may be disproportionately affected. Intersectional analysis of violence as experienced by women; as experienced by Métis people; and as experienced specifically by Métis women produces a more robust and accurate understanding of these project impacts and, thus, potential mitigation strategies to reduce or prevent those impacts.⁵

Throughout this submission, we will apply this intersectional approach to examining potential project impacts through a gender-based violence framework.

Key Resource: *Reclaiming Power and Place: The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls*

Throughout these comments, the National Inquiry into Missing and Murdered Indigenous Women and Girls' Final Report on *Reclaiming Power and Place* is cited often; this submission provides an extensive overview of the experiences of Indigenous women and girls, including Métis. However, a gap in literature covering impacts of industrial worksite, work camps, and workers on Métis women in Alberta was identified. To robustly identify potential impacts of the project on Métis women, more research is required.

Known Impacts from Work Camps on Indigenous Communities, Women & Girls

It is of critical importance to the Otipemisiwak Métis Government that the well-being of Métis women and girls is prioritized throughout the entire lifecycle of the project, including not only construction and operational phases, but also during planning, impact assessment and licensing. Work camps housing transient and permanent workers, as will be employed through the project, have clear, documented impacts on the well-being of Indigenous women and girls.⁶

As such, the Integrated Tailored Impact Statement Guidelines must include provisions requiring the proponent to work with Indigenous nations, including the Métis Nation within Alberta as represented by the Otipemisiwak Métis Government, to fully identify how the introduction of work camps into the Peace River area may impact the well-being the Métis women and girls in

⁵ "Reclaiming Power and Place: The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls." https://www.mmiwg-ffada.ca/wp-content/uploads/2019/06/Final_Report_Vol_1a-1.pdf pg 103-104.

⁶ Ibid. pg 584-593.



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the community. These impacts, as explored in more detail below, must be explicitly included, as applicable, in sections 9 and 10 of the guidelines.

Sexual Harassment and Violence⁷

Industrial work camps can often foster hypermasculine, misogynistic environments that at best ignore and at worst encourage violence towards Indigenous women, including sexual harassment and assault. Significant pressure to engage in sexual activity is applied to Indigenous women, including Métis women, both in the workplace and in the towns surrounding the work site. Perceived and real power imbalances based on factors such as patriarchal structures and attitudes often amplify the inability of Métis women in these spaces to refuse sexual advances; due to the unsafe work and living environment of the camp, incidents of sexual violence or harassment in the male-dominated spaces are often not reported.⁸

The heightened risk of sexual violence associated with these industrial work camps is not limited to Métis women strictly within the work camp and site; Métis women and girls from communities surrounding the worksite and camps also face increased risk of sexual violence inflicted by members of this workforce. RCMP crime statistics have shown significant increases in reported sexual assault in neighbouring communities following the introduction of work camps (for example in Fort St. James)⁹, and the real scope of the problem is always much larger than crime statistics can capture.

Human Trafficking / Sex Trafficking

Human trafficking within Alberta today, particularly for sex work, is strongly associated with the resource extraction industry. As noted by the Canadian Centre to End Human Trafficking, “Alberta’s human trafficking corridors connect the province’s largest online commercial sex markets, while also accessing markets affiliated with extraction work camps in Fort McMurray and Grande Prairie.” Most recent sex trafficking arrests by Alberta Law Enforcement Response Teams have been in municipalities heavily reliant on resource extraction along these human

⁷ Gibson, G., K. Yung, L. Chisholm, and H. Quinn with Lake Babine Nation and Nak’azdli Whut’en. 2017. *Indigenous Communities and Industrial Camps: Promoting healthy communities in settings of industrial change*. Victoria, B.C.: The Firelight Group. <https://firelight.ca/assets/publications/reports/firelight-work-camps-feb-8-2017.pdf>

⁸ MMIWG Final Report, Vol 1a, pg 587

⁹ Shandro, J., L. Jokinen, K. Kerr, A. Sam, M. Scoble, and A. Ostry. 2014. “Ten Steps Ahead: Community Health and Safety in the Nak’al Bun/Stuart Lake Region During the Construction Phase of the Mount Milligan Mine.” <https://projects.eao.gov.bc.ca/api/document/5887e0f6f64627133ae5b2a3/fetch>



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trafficking corridors.¹⁰ Importantly, the Town of Peace River is only two hours north of Grande Prairie, a known hub for human trafficking, and the Grande Prairie area will no doubt be involved in the project. As noted by the MMIWG report, “resource development activities often bring an in-migration of young men with high salaries and little stake in host communities. The influx of money and workforces into communities can influence...sex trade activities”.¹¹



Alberta’s intra-provincial human trafficking corridors¹²

¹⁰ Smith, T. 2025. “Grande Prairie community raising awareness on human trafficking.” Everything GP, May 25, 2025. <https://everythinggp.com/2025/05/26/grande-prairie-community-raising-awareness-on-human-trafficking/>

Alberta Law Enforcement Response Teams. 2025. “Three human traffickers arrested in Project Endgame.” Feb 13, 2025. <https://alert-ab.ca/three-human-traffickers-arrested-in-project-endgame/>

McDermott, V. 2025. “As bad as it's always been’: Alleged Canada-wide sex trafficking ring included Fort McMurray.” Fort McMurray Today, Feb 20, 2025. <https://www.fortmcmurraytoday.com/news/as-bad-as-its-always-been-alleged-canada-wide-sex-trafficking-ring-included-fort-mcmurray>

¹¹ MMIWG Final Report, Vol 1. pg 586

¹² Canadian Centre to End Human Trafficking. 2021. *Human Trafficking Corridors in Canada*. <https://www.canadiancentretoendhumantrafficking.ca/wp-content/uploads/2021/02/Human-Trafficking-Corridors-in-Canada-Report.pdf>



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Economic pressure to participate in the sex trade is a common indirect effect of industrial projects. When a community experiences a rapid increase in local income – and thus in money being spent locally – it can lead to higher cost of living, including in the price of food and housing. These heightened costs can greatly disadvantage people who live within these communities full-time without the higher salaries of the camp workers. Those struggling and experiencing other vulnerability factors can feel increased pressure to seek riskier opportunity.¹³

Sex/Human traffickers also target marginalized groups like Indigenous women, immigrants, and members of the 2SLGBTQIA+ community. As Diane Redsky, the executive director of Ma Mawi Wi Chi Itata Centre, noted in her testimony to the MMIWG Inquiry, predators target Indigenous girls at bus depots or airports in order to take advantage of their vulnerability during a period of transition such as aging out of care.¹⁴

Ensuring the protection of Métis women, girls and 2SLGBTQIA+ people from sex trafficking, and providing support and resources to help them exit the industry, is a priority valued component (VC) for the Otipemisiwak Métis Government.

Addictions & substance abuse

There is commonly an influx of alcohol and illicit drugs into a community with the arrival of workers with higher disposable income, such as those in industrial work camps.¹⁵ Drug and alcohol use is prevalent in camps, contributing to violence and making the work environment unsafe.¹⁶ Links between alcohol consumption and increased sexual harassment and assault are well established, but research on the influence of work camp policies (e.g. dry vs controlled consumption) on these outcomes is scarce. While dry camp policies have been shown to potentially improve conditions in camps, the impacts they have on substance use by camp workers in neighbouring communities are less clear.¹⁷ In general an increase in substance abuse will cause strain on local services, with potential higher caseloads, complexity of new drugs and substances, and other mental health issues that may result.

Substance abuse can lead to increased rates of domestic violence and intimate partner violence, both as a direct result of intoxication as well as in combination with other factors. For example,

¹³ MMIWG Final Report, Vol 1. pg 590.

¹⁴ Ibid. p. 553.

¹⁵ Gibson et al.2017.

¹⁶ Barnes, E. 2025. "Beyond violence: Building equity and safety in Canada's industrial energy resource work camps." *Energy Research & Social Science*, Volume 127, September 2025.
<https://www.sciencedirect.com/science/article/pii/S2214629625002749> pg 4.

¹⁷ Ibid. pg 5.



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relationship strain from the realities of work camp life, including shift work, stress, and extended separation from loved ones, accompanied by an increased rate of alcohol and substance abuse, can significantly increase the risk of domestic violence when workers are home.¹⁸ Addiction has a significant physical and psychological impact on families, which can be severe and long-lasting. This can take the form of children taking on surrogacy of their parents, financial and emotional hardships, family instability, and trauma.¹⁹

There is also a strong and consistent link between substance abuse and sex work. This link goes both ways, as addicts and people with severe mental health issues are at higher risk of becoming sex workers, and sex workers are at heightened risk of mental health issues and drug addiction due to frequent exposure to the illicit drug industry and the ever-present threat of abuse and sexual assault.²⁰

The health and well-being of Métis women and girls as it pertains to addictions is a priority valued component (VC) for the Otipemisiwak Métis Government, and the project needs to incorporate ways to strengthen prevention, treatment, and wrap around supports in the region.

STIs

The connection between sexually transmitted infections (“STIs”) and industrial worksites and camps is a relatively under researched topic which requires further investigation.²¹ However, inferences based on existing knowledge substantiate the urgent need to begin exploring this topic in research studies. For example, as established in the previous section (Sexual Harassment and Violence), the introduction of industrial work camps is shown to increase the number of Indigenous women living in surrounding communities who engage in sex work; involvement in sex work is known to increase health risks such as the rate of STIs. The project is also being developed in the context of an ongoing syphilis outbreak in Alberta, particularly the northern zone, with significant risks of stillbirth, infant death and developmental delay and with

¹⁸ MMIWG Final Report, Vol 1, pg 588-589

¹⁹ Maina G, Ogenchuk M, Sherstobitoff J, Bratvold R, Robinson B. 2022. “Engaging Community Partners to Understand and Respond to Substance Use and Addiction Crisis Facing Families in Prince Albert, Saskatchewan.” *Substance Abuse: Research and Treatment*, Vol 16:1-8. September. doi: 10.1177/11782218221126881.

²⁰ Jeal N, Patel R, Redmond NM, et al. “Drug use in street sex workers (DUSK) study protocol: a feasibility and acceptability study of a complex intervention to reduce illicit drug use in drug-dependent female street sex workers.” *BMJ Open* 2018; 8. <https://doi.org/10.1136/bmjopen-2018-022728>

²¹ Westwood, E. & M. Orenstein. 2016. “Does resource development increase community sexually transmitted infections? An environmental scan.” *The Extractive Industries and Society* 3 (2016) 240–248.



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Indigenous populations over-represented in case populations. Increased STI education and prevention efforts need to be expanded even in the absence of the project.

STIs as a potential impact to the health of Métis women resulting from the project is of high concern for the Otipemisiwak Métis Government; the lack of existing research on the impact of the introduction of industrial worksites and camps on STI rates in surrounding Indigenous communities indicates that this topic must be explored further as a requirement of the Impact Statement Guidelines.

Policing

There are significant concerns associated with project impacts on local policing and how that will affect Métis women in surrounding communities. Colonial systems of policing disproportionately impact Métis women, who are at higher risk of experiencing police harassment and violence.²²

The increase in population associated with the project – whether transient or permanent – will introduce heightened crime (as discussed in other sections) and thus a heightened need for local police responses. The ability of local police to respond to increased rates of crime in a culturally appropriate way that prioritizes the safety and well-being of Métis women is essential. In general, current policing systems do not adequately prioritize the safety and well-being of Métis women; to properly determine the extent of this impact and appropriate ways forward in addressing it, more information is needed on the local policing context of Métis communities surrounding the project, including in Peace River.

Transportation safety & hitchhiking

The development of transportation infrastructure, such as service roads, paired with the increase of traffic in the area associated with the influx of transient workers, creates additional hazards, risks, and impacts to Métis communities surrounding worksites and camps. Increased industrial traffic is correlated with road safety; “higher volume, road conditions, and hazardous corners” correlate to an increase in vehicular accidents and other negative road-based interactions.

Furthermore, dust and sediment resulting from increased traffic has negative health impacts on surrounding communities and community members, and particularly those who suffer from

²² Dhillon, J.K. 2015. “Indigenous girls and the violence of settler colonial policing” *Decolonization: Indigeneity, Education & Society* Vol. 4, No. 2, 2015, pp. 1-31.

<https://jps.library.utoronto.ca/index.php/des/article/view/22826/19343>



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respiratory disorders, young children, Elders and those of elderly age, and other at-risk individuals. Both minority cultures and genders, including the Métis and women, are known to suffer from increased risk of health issues, and Métis people are often out on the land near back road traffic, which make them more vulnerable to the health risks associated with dust and sediment. Further exploration on the types and extent of these health impacts on Métis women is necessary to fully establish potential project impacts to be addressed.

Increased industrial traffic will also introduce increased instances of hitchhiking in the surrounding communities; disadvantaged community members may not have personal transportation available and will instead look elsewhere for transportation opportunities. Métis women who engage in hitchhiking with industrial workers associated with the project worksite and camps will be at higher risk of experiencing danger or violence.

Transportation development and industrial traffic associated with the project needs to be addressed in a way that considered the needs of the surrounding community, including addressing the specific needs of Métis women. In considering what vehicles are allowed into worksites and camps, the health and safety of Métis women need to be prioritized over convenience and logistics of camp workers.²³

Traditional land use

Many Métis families rely on the land for harvesting, for identity, and for a sense of well-being. Access to land for traditional uses has been shown to be a key social determinant of health (both physical and mental). These constitutionally protected traditional land uses by Métis people can be adversely impacted by the introduction of a work camp in a region due to several factors:

- Increased traffic and noise,
- Ecological disturbance from construction activity for the camp and required roads,
- Contamination of wildlife, plants, medicine and fish from construction, sewage runoff, illegal dumping/littering, and vehicles.
- Increased competition for resources as off-shift workers become harvesters themselves.²⁴

²³ Gibson et al, 2017. pg 32-33

²⁴ Ibid.



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These impacts mean that Métis land users will need to travel further to access viable habitat (creating increased costs for transportation and increased time constraints), they will face increased traffic on back roads and increased interaction with hunters not familiar with the territory and local norms. Métis women harvesters have expressed concerns for their personal safety when interacting with non-Indigenous hunters and industrial workers in the backcountry. This requires them to constantly justify their presence in the face of racism and sexism, with several reporting incidents of escalation and threats. Such interactions will only increase with an increase in non-Indigenous land users from outside the region. Furthermore, given that traditional land use is typically a family activity central to cultural continuity, increased barriers will have long-term intergenerational effects.

Current Situation in the Peace River Area

The Town of Peace River is actively working towards making its community a safer place by addressing social disorder, public intoxication, drug use, and encampments, all issues that commonly increase with an influx of transient workers. However, the Town has noted that its resources are stretched too thin to address existing social issues, let alone the increased challenges expected with the project. In the town administration's report on a 2024 "Enhanced Public Security Services Pilot Project", they stated:

"Because of our location, limited available wrap-around support services, scarce public transportation, a constantly understaffed RCMP detachment, and proximity to Peace Regional Correctional Centre (PRCC) have significantly compounded the level of social issues faced by Peace River over other communities of similar size and structure.

Funding and/or implementation of potential solutions to begin addressing root causes of these social problems, providing humanity through housing, food security, mental health, and basic living supports are far beyond the capacity of a municipality and legislatively are the responsibility of higher orders of government, yet it's at the local government level where the harm is most evident and felt.

Once focused on municipal priorities like road maintenance, potable water, and sustainable infrastructure, seeing no alternative, the focus of this Council has had to shift attention towards seeking solutions to mitigate further harm to the community. Having



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to do so has consumed extensive amounts of municipal resources, both financial and human, and has taken efforts away from traditional municipal priorities like infrastructure.”²⁵

This assessment does not bode well for the resilience of the community in facing the challenges this project will present. The town administration notes that the Provincial and Federal governments are not providing the required supports to address the pressing issues that are within their jurisdiction and responsibility, and this deficit must be addressed proactively before project construction begins. In other words, without a significant influx of Provincial and Federal funding for wrap-around support services and basic living supports, this project risks causing easily predictable damage to the Peace River community.

The proponent also has a key role to play in pressuring all levels of government to fulfill their obligations in this area, as well as through directly supporting key programs and infrastructure that will be impacted by the project.

The increase in transient workers will have impacts beyond the Town of Peace River, Municipal District of Peace, Northern Sunrise or Northern Lights Counties where the physical project, camps and supporting plants may be located. This includes the Grande Prairie area as well as further downstream towards High Level / Fort Vermillion and east towards Slave Lake. Socio-economic baselines, including gender-based violence impacts on Métis women and girls, need to be done in those areas as well as identifying likely impacts from the project and mitigation measures.

²⁵ “Administration Report: On The 3-Month Contracted Enhanced Public Security Services Pilot Project.” November 22, 2024, pg. 2
<https://peacriver.civicweb.net/document/139876/2024%2011%2025%20RFDire%20Public%20Security%20Services%20in%20Pe.pdf>



Recommendations

Supplementing GBA Plus for Indigenous women

The Gender Based Assessment Plus (GBA Plus) framework required for the Impact Statement does not adequately address the specific realities, barriers, and challenges faced by Indigenous women. We recommend supplementing the GBA Plus framework with specific resources to improve how it addresses these realities.

Section 1.3 Gender-Based Analysis Plus (GBA Plus)

We recommend adding a paragraph to the end of Section 1.3 to state:

“When implementing GBA Plus frameworks in interactions with Indigenous nations, the general GBA Plus framework should be supplemented with culturally-specific approaches to intersectionality and gender-based impacts, such as:

- “Culturally Relevant Gender-Based Analysis” developed by the Native Women’s Association of Canada,²⁶
- “Indigenous Gender Based Analysis Plus” developed by the BC Minister’s Advisory Council on Indigenous Women,²⁷ and
- “Métis-Specific Gender-Based Analysis Plus” developed by Les Femmes Michif Otipemisiwak.²⁸

Explicit inclusion in the baseline assessment

9.1.1 Baseline conditions for health, social and economic conditions

We recommend expanding the list of baseline assessment requirements on page 100 to include detailed description of existing resources and services for community members experiencing violence and assault; including, for example, crisis lines, safe houses and counselling. This can identify gaps, and areas for future planning.

The baseline should also carry out in-depth research on experiences of gender-based violence, as police statistics are not reliable or sufficient to understand the extent and lived experiences of this type of violence.

²⁶ <https://stbbi.nwac.ca/wp-content/uploads/2021/02/CRGBA-Starter-Kit.pdf>

²⁷ https://www2.gov.bc.ca/assets/gov/british-columbians-our-governments/indigenous-people/aboriginal-peoples-documents/maciw_igba_toolkit.pdf

²⁸ <https://metiswomen.org/wp-content/uploads/2024/09/Metis-Specific-GBA-Tool.pdf>



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The Otipemisiwak Métis Government should be involved in this baseline assessment for Métis Citizens.

Mitigating negative impacts

Well-funded community supports - for the safety of Métis women and girls, crisis intervention, support for survivors of gender-based violence, and gender-based violence prevention - are a priority valued component (VC) for the Otipemisiwak Métis Government. The proponent must play a role in assessing and funding these supports to mitigate the likely adverse impacts from the work camps created for the project.

Section 9.1.3 Mitigation and enhancement measures

In the list of “The Impact Statement must” on page 103 under “describe the proposed mitigation and enhancement measures that will be implemented for all social effects...”, bullets should be included that state:

- Describe how the Proponent will support and increase programs and infrastructure in surrounding communities to mitigate known impacts from transient work camps, such as:
 - crisis support teams and crisis response plans with adequate resources for sexual assault and harassment situations.
 - community wellness teams and intervention services to offset negative impacts from industrial camps (i.e., keep people busy and occupied with healthier things).
 - safe places for youth, women, and other vulnerable members (e.g., elders) that are in situations of sexual assault, domestic abuse, or other unsafe situations.
 - support networks for recovering addicts (e.g., AA meetings), as well as support/healing for sexual assault survivors and perpetrators.
 - awareness, engagement, testing, tracking, and treatment for STIs, as well as accessible information and options for birth control and pregnancy tests.
 - resources and safety measures (e.g., police station/ security in community, nurses, doctors) for responding to sexual assault and harassment cases (e.g., rape kit, safe house, support network/contact list, counselling) and empower community to act by having a clear crisis response plan.



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- Describe how the Proponent proposes to work with municipal and provincial governments to ensure programs and infrastructure are ramped up to meet the needs of the community and workers in these areas.
- Describe how the Proponent will ensure funding and accountability are in place for programs relating to sexual assault and harassment, drugs and alcohol prior to the construction of any work camps.
- Describe how camp workers will be educated on protocols for off-hours land use, including the rights of Indigenous people (including Métis women) to conduct traditional land uses free of barriers and harassment, and how workers will be held accountable for their behaviour in this area.
- Describe a proposed grievance mechanism through which surrounding communities can raise issues about work camps independently.

Section 10.5 Mitigation and enhancement measures

Ensuring Work Camps Benefit Indigenous Women

Culturally safe, positive, protected and supported employment of Métis women at all levels and in all phases of the project is an important valued component (VC) of the Otipemisiwak Métis Government. In the list of “The Impact Statement must” on page 122 under “describe the proposed mitigation and enhancement measures that will be implemented for all social effects...”, bullets should be included that state:

- Describe specific proposed measures to ensure employment of Indigenous women in the project, including, inter alia:
 - the design of work camp infrastructure, policies, supports, enforcement and safety measures, to ensure safety from racial and gender-based violence, harassment and discrimination
 - Gender-balance employment policies and supports.

The proponent must be intentional and diligent in how camps are established and operated (even if operated by another company or contractor). This should include strategies such as:

- Ensure there is gender-balanced employment, offering both technical and non-technical employment opportunities for local Indigenous women.
- Use a gendered-lens (e.g., involve Indigenous women) in the design, operation, and maintenance of projects and camps (e.g., build women-only dorms).



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- Ensure there is an Indigenous woman in a superior liaison position for support if women experience sexual violence in the workplace.
- Develop support staff who work within the camps, but independently from the company so that female workers feel safe to report sexual harassment and/or sexual assault situations and any other concerns without fear of losing their job.
- Indigenous women should have formal mentoring programs connecting them with other Indigenous women in managerial and leadership roles.
- Ensure concerns and issues related to sexual violence, assaults, harassment, drugs and alcohol are addressed and actions are recorded and monitored.
- Identify consistent policies with respect to drugs and alcohol (i.e., dry camp, or regulated, monitored alcohol consumption) and monitor any trafficking activity.
- Implement measures to hold employees responsible and accountable for their actions even during off-shift hours.
- Communicate clear policies and repercussions in place for sexual assault & harassment.
- Training on workplace harassment and discrimination policies is vital, but clear and consistent enforcement of those policies is equally vital.

Conclusion

The influx of temporary and permanent workers into the Peace River area for this project will be significant, and the adverse impacts of that influx and associated work camps will be wide-ranging. Impacts related to gender-based violence are known to affect Indigenous women living in these camps and in neighbouring communities, and require proactive investment in programming, services, infrastructure and other supports for prevention and mitigation. The Otipemisiwak Métis Government must be involved at all stages of the project to address impacts to Métis women. In terms of the proponent's preparation of the Impact Statement, the Otipemisiwak Métis Government is prepared to support and lead elements related to Métis Citizens, such as the baseline assessment, the design of appropriate mitigation measures, and measures to ensure the safe and effective participation of Métis women in the project through employment and contracting/supplier relationships. We encourage the proponent and regulators to maintain a distinctions-based approach to the assessment and ensure a Métis-specific consultation process given the unique history, presence and experiences of Métis people in the region.

-END-