

Federal Authority Advice Record (FAAR)**FAAR Response must be submitted by August 22, 2025**

Yellowhead Copper Project – Taseko Mines Limited (proponent)

Registry File: 89694

Please complete the following:

Department/Agency	Women and Gender Equality Canada
Lead Contact	MigaChultem, Director, GBA Plus Directorate, Strategic Policy Branch
Full Address	22 Eddy Street, 10th Floor Gatineau, QC J8X 2V6
Email	FEGC.EvaluationImpacts-ImpactsAssessment.WAGE@fegc-wage.gc.ca
Telephone	819-938-1132
Alternate Contact	Megan Kirby, Policy Officer, GBA Plus Directorate, Strategic Policy Branch, Megan.Kirby@fegc-wage.gc.ca

1. Will your department or agency exercise a **power, perform a duty or function**, or provide **financial assistance**, related to the project to enable it to be carried out in whole or in part?

As relevant,

- a) Specify the power, duty or function, or financial assistance, and the likelihood that it will be required to construct the project, based on the Initial Project Description, as either Required, Potential, Likely, Unlikely or Not Required **Not applicable. WAGE does not hold any regulatory power, functions, or duties.**
- b) Describe any associated Indigenous or public consultation, including timelines **Not applicable.**
- c) Describe any associated information requirements (e.g., alternative means assessment, habitat offsetting), and specify those that may be coordinated with the impact assessment process, if an impact assessment is required **Not applicable.**
- d) Identify any associated project-specific guidance or issues of which the proponent should be aware, or information the proponent should provide.

Below are the links to further information on GBA Plus. Information on GBA Plus and gender-based violence (GBV) is also available after Table 1.

WAGE:

- [Take the Gender-based Analysis Plus course - Women and Gender Equality Canada](#)
- [What is gender-based violence? - Women and Gender Equality Canada.](#)

External from WAGE:

- House of Commons Standing Committee on the Status of Women (FEWO) released a study on [Responding to the Calls for Justice: Addressing Violence Against Indigenous Women and Girls in the Context of Resource Development Projects](#),
- [2023-24 Reporting on the Calls for Justice 13.1 to 13.5: Calls for Extractive and Development Industries](#) (CIRNAC),

- [Impact Assessment & MMIWG Calls for Justice](#),
- [Portrait of Women by the Relative Remoteness of their Communities, Series 4: Labour Characteristics \(ISC\)](#),
- [MMIWG's findings on 'man camps' are a good place for government to get started - Macleans.ca](#)

2. **Using Table 1**, identify project- and context- specific **key issues**, based on the expertise within your mandate¹ and the information in your possession, including the Initial Project Description, any exchanges with the proponent or others related to the project and known means to address the effects of the project. For each key issue:

- a) Specify the key issue (e.g., specific species and location)
- b) Specify the project component or activity linked to the key issue
- c) Explain why it's a key issue based on:
 - i. biophysical effect pathway(s) from the specific project component or activity
 - ii. concern unique to the project or a priority within your mandate
 - iii. the issue being material² to decision making under the *Impact Assessment Act*
- d) Identify how the issue could be resolved, including through means other than an impact assessment
- e) Identify additional information the proponent could provide including to give confidence on how the issue can be addressed through other means.

Women and Gender Equality
Canada

Name and title of Departmental /
Agency Responder

August 18, 2025

Date

¹ Refer to the [Memoranda of Understanding with IAAC](#).

² An issue is material to decision making if its analysis is anticipated to affect the conclusions on (1) whether adverse effects within federal jurisdiction or direct and incidental adverse effects (collectively adverse federal effects) are likely not significant, or of low, medium or high significance; (2) appropriate mitigation measures for significant adverse federal effects; or (3) justification in the public interest.

Table 1: Key Issues to inform the impact assessment process

This table should outline key issues to inform the impact assessment process, including whether an impact assessment is required and, if so, the scope of the assessment and tailoring of the Tailored Impact Statement Guidelines/Application Information Requirements in a substituted assessment.

Key issues are the major concerns directly related to a project component or activity, the analysis of which is anticipated to be material to decision-making under the *Impact Assessment Act*. Federal authorities' advice should be guided by the identification and resolution of key issues. If an impact assessment is required, it will be focused on key issues.

Comment ID	a) Key issue	Project component or activity	c)(i) Biophysical effect pathway(s)	c)(ii) Concern unique to the project or a priority within your mandate	c)(iii) Material to federal decision-making	d) Means for issue resolution	e) Additional information from the proponent
<p><i>Identify comments by organization and comment number.</i></p> <p>e.g.: IAAC-01</p>	<p><i>Specify the key issue (e.g., specific species and location).</i></p>	<p><i>Identify the project component or activity linked to the key issue.</i></p> <p><i>Be specific about the nature, scale, novelty and complexity or the component or activity.</i></p>	<p><i>Identify the specific biophysical effect pathway between the project component or activity and the affected environmental or human receptor (including Indigenous Peoples).</i></p>	<p><i>Describe why it's a key issue within the mandate of your department or agency, including in terms of priorities of the federal government and in terms of anticipated likelihood, severity or uncertainty of effects.</i></p> <p><i>Identify if the key issue is common for projects of this nature or in this sector, or whether it's unique to this project due to its complexity, size or novelty; a sensitive or rare receiving environment; and/or proximity of sensitive environmental or human receptors (including Indigenous Peoples).</i></p>	<p><i>Describe why the key issue is material to decision-making as either:</i></p> <ul style="list-style-type: none"> • <i>an adverse effect within federal jurisdiction, or a direct or incidental adverse effect, that may be significant based on available evidence including:</i> <ul style="list-style-type: none"> ○ <i>federal experts' knowledge and experience with past project assessments;</i> ○ <i>presence of sensitive species, habitats or human receptors (including Indigenous Peoples);</i> ○ <i>novel or complex project activities, components or technologies;</i> ○ <i>high uncertainties in effects or in the effectiveness of mitigation measures;</i> ○ <i>unknown or unproven mitigation; or</i> • <i>a factor for the justification in the public interest anticipated to be material to decision-making such as a likely positive effect contributing to sustainability, to Canada's environmental obligations or climate change commitments or in supporting governmental priorities, such as reconciliation with Indigenous Peoples.</i> 	<p><i>Describe how the key issue could be resolved or addressed by:</i></p> <ul style="list-style-type: none"> • <i>Any means, including powers, duties, functions, frameworks, policies or guidance that your department or agency has;</i> • <i>Any means, including powers, duties, functions, frameworks, policies or guidance from another jurisdiction, including the province;</i> • <i>Common, proven, well-understood or standard mitigation measures to mitigate the effect or effect pathway(s); or</i> • <i>Commitments made by the proponent (e.g., in the Initial Project Description).</i> 	<p><i>Describe information the proponent can provide, or commitments the proponent can make, in their Response to the Summary of Issues that would provide confidence that the issue can be resolved by existing means.</i></p> <p><i>Consider whether information, studies, analyses or collaborative work with other authorities would be required to address the issue beyond existing means.</i></p>
WAGE-01	Mitigation measures for potential gender-based violence	<ul style="list-style-type: none"> • Section 4.2.1.10 Construction Camp • Section 4.4 Workforce 		Include mitigation measures for potential GBV against Indigenous women,	<ul style="list-style-type: none"> • Section 4.2.1.10 Construction Camp states that a full-service camp to house the construction workforce is planned and will 	Consider adopting the following mitigation measures to address potential GBV risks.	Responding to the Calls for Justice: Addressing Violence Against Indigenous Women and Girls in the Context of

	<p>(GBV) related to the Project</p>	<ul style="list-style-type: none"> Section 8.2 Human Environment and Community Wellbeing Table 9-1 Potential Project Interactions 		<p>girls, and 2SLGBTQI+ peoples.</p>	<p>house peak workforce of 540 personnel” and will be decommissioned and removed after construction is complete (pgs. 30-31).</p> <ul style="list-style-type: none"> Table 4-4 Estimated Project Workforce by Phase indicates that 2,180 direct (construction) workers will be employed. However, it is not clear where these workers will be housed, nor why there is a discrepancy between “peak workforce of 540 personnel” (pg. 30) and 2180 direct workers (pg. 34) during the construction phase. Table 4-4 indicates that “It is expected that operations personnel will live and integrate with local communities.” This is approximately 590 direct and 1,120 indirect workers over the operation period (25 years). Table 9-1 identifies Construction Camp Use as having a potential project interaction with “social and economic” during construction but not operation. What is the rationale for this if approx. 590+ workers are expected to live and integrated with local communities during the 25-year operational period? (pg. 100). Given that there are a number of Indigenous and rural communities (e.g., Vavenby is 3KM from the proposed Project site with a population of approx. 237 people). in the surrounding region, potential social impacts from an influx of temporary workers – whether housed in a construction camp or within nearby communities – on Indigenous women, girls and 2SLGBTQI+ people should be considered. 	<p>a) Robust workplace education and sensitivity training, including, but not limited to, anti-violence policy that incorporates gender-appropriate, gender-specific, and culturally appropriate policies and processes.</p> <p>b) Survey and include existing services and supports related to gender-based violence (e.g. sexual assault services, shelters, family violence, victim and legal services, Indigenous supports, 2SLGBTQIA+ supports, etc.) to be added to Section 8.2 Human Environment.</p>	<p>Resource Development Projects – recommendation 11 training for workers</p> <p>Impact Assessment & MMIWG Calls for Justice – Particularly the link between sexually transmitted diseases and workers camps as an impact on “social infrastructure” pgs. 11, 13-14.</p> <p>Gender based violence is a public health issue: using a health systems approach (WHO)</p> <p>Human Trafficking Corridors in Canada. Sex trafficking identified by service providers, Mining camps, see pg. 14. Extraction camp corridor (AB), pg. 30. British Columbia corridors, pg. 31-32.</p> <p>Resource: GiiiA Gender-based Indigenous Intersectional Impact Assessment Network.</p>
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					<ul style="list-style-type: none">• WAGE recommends the Proponent to include gender-based violence risks and considerations in workforce plans, as there are potential social, economic, health, and cultural impacts. For example, the Proponent could survey sexual health services that are currently available to the community (e.g. proximity of sexual and medical assault care centres to the Project) as a mitigation measure for potential GBV risk exists (e.g. sexual violence, STIs, etc.) and potential increase in demand for these services by workers, their families (if they move to the area), and potentially impacted communities, including Indigenous groups.		
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<p>WAGE-02</p>	<p>Application of Gender-based Analysis Plus (GBA Plus) in assessing potential effects of the Project on Indigenous Peoples</p>	<ul style="list-style-type: none"> Section 8.2 Human Environment and Community Wellbeing Section 8.2.1 Social Environment Appendix C: Engagement Plan 		<p>Inclusion of GBA Plus.</p>	<ul style="list-style-type: none"> Currently, GBA Plus is only referred to in “Appendix C: Engagement Plan,” and how “community members may be disproportionately impacted by the Project or may be underrepresented will be identified.” (Appx C, 13) However, this is not expanded upon nor is GBA Plus integrated or included elsewhere in the IPD. Section 8.2 Human Environment and Community Wellbeing, does not apply GBA Plus to inform the existing conditions and potential for effects of social, economic, cultural, and Indigenous interests (pg.94). As a result, there is little-to-no information regarding the demographics of local communities (e.g., Vavenby, Clearwater, Barriere, and Chu Chua) who are predicted to “provide sources of employment, business and contracting services” for the Project (pg. 97). Section 8.2.1 Social Environment does not provide information about employment rates or types of employment for nearby communities, or insight for social or health services that may be impacted with an influx of workers into the community. In addition, Simpcw, which was identified as the “highest potential to be affected by the Project site and transmission line” (pg. 75) have identified “employment, education, contracting opportunities, and economic benefits and opportunities for current and 	<p>WAGE recommends the Proponent include GBA Plus to ensure a sustainable economic reconciliation that will be beneficial to the local Indigenous groups.</p> <p>Include the following text in Section 8.2 GBA Plus is an analytical tool used to support the development of responsive and inclusive policies, programs, and other initiatives. GBA Plus is a process for understanding who is impacted by the issue or opportunity 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 an intersectional analysis that goes beyond biological (sex) and socio-cultural (gender) differences to consider other factors, such as age, disability, education, ethnicity, economic status, geography (including rurality), language, race, religion, and sexual orientation.</p> <p>The application of GBA Plus will support the creation and collection of baseline information for monitoring social, economic, health, and cultural impact on potentially effected communities.</p> <p>Below are some suggestions on how GBA Plus could be included in Section 4.4 Workforce and Section 8.2 Human Environment and Community Well-being:</p> <ol style="list-style-type: none"> Targeted hiring and skills training goals for local 	<p>What is Gender-based Analysis Plus - Canada.ca</p> <p>Introduction to GBA Plus - Women and Gender Equality Canada</p> <p>Strengthening Impact Assessment for Indigenous Women, see pgs. 56, 58 and Indigenous Women and Impact Assessment Final Report pgs. 16, 48. regarding the importance of establishing baseline data for monitoring and reporting, particularly for Indigenous women and children.</p>
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					<p>future Simpcw generations” (pg. 81). However, detailed plans on how the Project will ensure economic inclusion through Indigenous employment needs further elaboration.</p> <ul style="list-style-type: none"> • For example, are there any plans to prioritize Indigenous hiring or training during the construction and operation phases of the Project to support a) identified Indigenous and Band interests b) Section 4.4 Workforce of “a skilled and experienced workforce, with transferable skills from other project construction and operations for a range of skilled trades and technical disciplines.” (pgs. 33, 92). 	<p>Indigenous communities (e.g. target percentage)</p> <p>b) Robust workplace education and sensitivity training, including, but not limited to, anti-violence policy that incorporates gender-appropriate, gender-specific, and culturally appropriate policies and processes (also applicable to WAGE-01).</p>	
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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>

The below sections of text are supported by the [Tailored Impact Statement Guidelines Template for Designated Projects Subject to the Impact Assessment Act - Canada.ca](#), the [Guidance: Gender-based Analysis Plus in Impact Assessment - Canada.ca](#) provided by IAAC, and WAGE’s GBA Plus resources: [Gender-based Analysis Plus \(GBA Plus\) - Canada.ca](#).

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.

Additional information on disaggregated data:

- [Disaggregated Data Action Plan](#), including the 4 guiding principles: disaggregation, intersectionality, standards, and geography.
- [Gender, Diversity, and Inclusion Statistics Hub](#). The Hub enables data users to more easily find disaggregated and intersectional data, analytical products and insights.

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.