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Sent Date: Thu May 7 19:17:21 2026
To: Szilagy, Alessandra (IAAC/AEIC)
CC: Olivia Lawson
Subject: Community Health Centres of Northumberland - Tailored Impact Statement Guidelines Feedback

On behalf of the Community Health Centres of Northumberland (CHCN), we appreciate the opportunity to review the draft Integrated Tailored Impact Statement Guidelines, particularly those sections related to health, social, and economic conditions of Indigenous Peoples and broader considerations of wellbeing. As an organization grounded in the Model of Health and Wellbeing and the social determinants of health, CHCN values the direction the Guidelines take in expanding the impact assessment beyond biophysical effects to include the conditions that shape population health, equity, and wellbeing.

The Guidelines provide a strong foundation for a holistic understanding of health and wellbeing. We are particularly encouraged by the requirement to assess health, social, and economic conditions, including determinants such as housing, income, food systems, education, access to services, safety, and social cohesion. The integration of Gender-Based Analysis Plus (GBA+), Indigenous Knowledge, and community-identified valued components further strengthens the framework by recognizing that health outcomes are shaped by intersecting social, cultural, economic, and environmental factors.

From a Community Health Centre (CHC) perspective, several elements of the Guidelines clearly support a social determinants of health approach, including:

- Requirements to assess both positive and adverse effects on health, social, and economic conditions, including mental health and psychosocial wellbeing;
- Recognition of food security, traditional food systems, and cultural dimensions of harvesting and consumption;
- Consideration of access to land, water, transportation routes, and culturally significant places that support wellbeing;
- Explicit inclusion of Indigenous governance systems, laws, and intergenerational knowledge transmission;
- Requirements to assess impacts on Indigenous rights, including relationships to land, cultural continuity, and economic well-being;
- Recognition that perceived environmental changes, sensory disturbance, and changes to land use can influence mental health and wellbeing; and
- Requirements for differentiated analysis through GBA+ and community-specific assessments.

Importantly, the Guidelines also require consideration of differential effects across populations and integration of community-defined concepts of health and wellbeing. This supports a more equity-informed approach, particularly where communities identify distinct priorities, concerns, and lived experiences.

At the same time, CHCN believes the Guidelines could be strengthened by providing greater clarity on how health equity considerations will be consistently operationalized within assessments. While the Guidelines require analysis of health, social, and economic conditions and include GBA+, they do not consistently specify a defined set of social determinants of health indicators or a standardized approach for evaluating how the proposed Wesleyville project may differentially affect health outcomes across marginalized or vulnerable populations.

From a community health perspective, clearer direction on this would strengthen consistency in assessing distributional impacts, particularly for populations who may experience increased vulnerability due to factors such as:

- Income insecurity and poverty;
- Housing instability or homelessness;
- Mental health and substance use challenges;
- Disability and chronic illness;
- Age-related vulnerability (children, youth, and older adults);
- Social isolation and caregiving responsibilities;
- Transportation and geographic access barriers;
- Newcomer or migrant status; and
- Limited access to primary care and community-based services.

While cumulative effects are addressed across the Guidelines, a more explicit linkage between cumulative environmental, social, and economic pressures and their potential to shape health equity outcomes over time would further strengthen the framework.

From a CHC lens, additional considerations that may strengthen the Guidelines include:

- Explicit consideration of impacts on health system capacity, including primary care, public health, mental health, and community support services;
- Stronger emphasis on cumulative social and environmental pressures as they relate to health and wellbeing outcomes;
- Clearer identification of health and wellbeing indicators that could be tracked over time to understand longer-term impacts;
- Meaningful opportunities for community-led monitoring and ongoing participation in defining health priorities and outcomes; and
- Identification of potential community benefit opportunities that may support improved wellbeing and reduced inequities.

Overall, the Guidelines support a holistic and community-informed approach to assess the impact of the project. The emphasis on Indigenous Knowledge, GBA+, and the broader factors that shape health and wellbeing aligns closely with the Model of Health and Wellbeing and the work of CHCs. We believe the framework would be further strengthened with additional clarity around how health equity impacts and social determinants of health will be consistently assessed and monitored over time, particularly for populations experiencing vulnerability or marginalization.

Thank you for the opportunity to provide input.

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