

General Comments from IAAC on the Webequie Supply Road Draft Study Plans - May 14, 2020

It is essential that the Impact Statement address all requirements outlined in the TISG, and that the study plans outline a clear approach to achieve these requirements. The Agency has highlighted sections of the TISG where requirements were not met in the draft study plans submitted to the Agency. Note that this is not an exhaustive list of TISG requirements and the TISG should be reviewed in its entirety, including the sections identified below.

#	Section of TISG	Impact Assessment Agency of Canada Feedback ¹	Required Action for Proponent
GC-01	Section 5 - Public Participation and views (including 5.1, 5.2)	As per Section 5 of the Tailored Impact Statement Guidelines (TISG), “the proponent must engage with the public and provide timely notification of proposed engagement activities to seek community knowledge and views, including on: baseline conditions; valued components and indicators, taking into consideration the requirements under Section 25 of this [TISG];” effects assessment and the assessment of the Project’s contribution to sustainability; mitigation and follow-up measures; and conclusions.”	Provide a clear description in the study plans of how public engagement opportunities have been and/or will be integrated into the impact statement phase. This must include detail on how the public will have opportunities to provide input to contribute to the development of the Impact Statement, as required in Section 5 of the TISG.
GC-02	Section 6 - Description of Engagement with Indigenous Groups (including 6.1, 6.2, 6.3)	As per Section 6 of the TISG, the Agency expects the proponent to engage with, at a minimum, the Indigenous groups listed in the Indigenous Engagement and Partnership Plan. Section 6 of the TISG also states that “in addition to the requirements set out in Sections 6.1, 6.2 and 6.3, the proponent must provide Indigenous groups with an opportunity to: • provide Indigenous knowledge during baseline data collection;	Provide a clear description in the study plans of how Indigenous groups will have opportunities to provide Indigenous knowledge, including the validation of how information they provided was applied. The study plan should include a description of the proposed methods for data collection, management of confidentiality, and information storage. This should also include a methodology for tracking

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		<ul style="list-style-type: none"> • comment on the list of valued components and indicators; • inform the effects assessment and review the proponent's conclusions; and • inform the development of mitigation measures and follow-up programs." 	<p>information that has been approved by the group, to demonstrate that the guidance outlined in Section 6.2 of the TISG has been incorporated into the study plans.</p> <p>Describe what engagement with Indigenous groups has been done in the development of the study plans, and/or any planned engagement with Indigenous groups on the proposed study plans.</p>
GC-03	Section 7 - Baseline Methodologies (Including 7.1, 7.2, 7.3, 7.4)	<p>Section 7.4 of the TISG states that "the spatial and temporal boundaries determined and established for the impact assessment will vary depending on the valued component and are considered separately for each valued component, including valued components related to the environmental, health, social and economic conditions of Indigenous peoples, or other potential effects and impacts..." Also, the same section states that "the proponent should engage with Indigenous groups when defining spatial and temporal boundaries for valued components, especially for those that are identified by Indigenous groups", and that "the proponent should validate with the Agency the spatial and temporal boundaries for each valued component."</p>	<p>Provide clear descriptions in the study plans of the proposed study areas and the criteria used to define the study areas.</p> <p>Describe how the Indigenous groups will be, or have been, engaged to provide input on spatial and temporal boundaries.</p> <p>Demonstrate how the Agency will be provided an opportunity to validate spatial and temporal boundaries.</p>

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GC-04		<p>The application of Gender-Based Analysis Plus (GBA+) in the collection and establishment of baseline conditions for diverse subgroups is necessary to support the meaningful application of GBA+ in determining the full scope of potential effects from the Project. GBA+ uses standard social science quantitative and qualitative data collection and analysis methods to describe baseline conditions across diverse subgroups.</p> <p>Refer to Agency guidance for more information on the GBA+ approach: https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/gender-based-analysis.html</p>	<p>Provide further details in the study plans on how GBA+ has been integrated into all aspects of data collection methodology, as per Section 7.1 of the TISG, and into the assessment of effects and impacts, as mentioned in Sections 13, 20, 21, and others, related to effects assessments of the TISG.</p>
GC-05	Section 13 - Effects Assessment (including 13.1, 13.2)	<p>In most study plans submitted there has not been any methodologies included for the effects assessment. Therefore, it is unclear if all project components and physical activities, in all project phases, have been considered in the effects assessment and if the effects assessment would align with the proposed baseline work. Further detail is needed to determine if the requirements in Section 13 of the TISG in relation to effects assessments will be met.</p> <p>The study plans should demonstrate how considerations of the interactions between environmental, health, social and economic effects have been taken into account. For example, an adverse environmental effect on a physical component (water) could result in an adverse environmental effect on a biological component (fish) that could in turn have an adverse social effect on fishing</p>	<p>Provide further details to demonstrate how the project's potential effects will be considered, as per the general requirements in Section 13 and topic-specific requirements in Sections 14 to 19 of the TISG. Ensure that the effects assessment considers the effects of each of the project components and physical activities, in all phases, and that it is based on a comparison to the proposed baseline work.</p> <p>Provide detail on how engagement with Indigenous groups and the public will inform the effects assessment.</p>

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		<p>and/or an adverse economic effect on an outfitter that provides guiding services.</p> <p>It is also noted in Section 13 of the TISG that “effects may impact communities, Indigenous groups and stakeholders in different ways, and therefore they may respond differently to them. Determining and characterizing effects should be based largely on the level of concern expressed through engagement with the impacted Indigenous groups and community members. The proponent is required to gather and consider Indigenous knowledge from potentially impacted Indigenous communities to inform the Project’s effects assessment and to describe how Indigenous knowledge was considered in their Impact Statement.”</p>	
GC-06	Section 19.2 - Impacts on the Exercise of Aboriginal and Treaty Rights	The study plan should demonstrate an approach for integrating impacts on rights considerations (changes to resource, access, and experience) into the assessment and collection of baseline information.	Describe an approach for identifying the potentially impacted rights of Indigenous peoples of Canada that are recognized and affirmed by section 35 of the <i>Constitution Act, 1982</i> , and for integrating the potential impacts on those rights into the collection of baseline information and the effects assessment.
GC-07	Section 25 – Description of the Project’s Contribution to sustainability	The study plan must reflect consideration of the sustainability principles in Section 25 of the TISG. The Impact Statement must characterize the Project’s contribution to sustainability. The Impact Statement should describe the context of the particular project, including the issues of importance to participants, the diversity of views expressed and the selection of valued components.	Provide detail to demonstrate how sustainability principles, as required in Section 25 of the TISG, have been considered in the proposed study plans.