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Abbreviations and short forms

Term	Definition
COMEV	Environmental and Social Impact Assessment Committee
COPC	Contaminant of potential concern
COSEWIC	Committee on the Status of Endangered Wildlife in Canada
Declaration	United Nations Declaration on the Rights of Indigenous Peoples
DFO	Fisheries and Oceans Canada
ECCC	Environment and Climate Change Canada
GBA Plus	Gender Based Analysis Plus
GHG	Greenhouse gas
the Guidelines	Tailored Impact Statement Guidelines
HHRA	Human health risk assessment
IAA	<i>Impact Assessment Act</i>
IAAC	Impact Assessment Agency of Canada
IEPP	Indigenous Engagement and Partnership Plan
Registry	Canadian Impact Assessment Registry
SACC	Strategic assessment of climate change
SARA	<i>Species at Risk Act</i>
VC	Valued Component



The Impact Assessment Agency of Canada (IAAC)'s guidance on the application of the *Impact Assessment Act* and its regulations is being updated, and the current versions of the guidance, referred to in this document, may not reflect IAAC's current practices. The proponent remains responsible for following applicable legislation and regulations. The proponent is encouraged to engage with IAAC regarding the applicability of the guidance. For more information, please contact shaakichiuwaanaan@iaac-aeic.gc.ca.

1. Introduction

The federal impact assessment process is intended to prevent or mitigate significant adverse effects within federal jurisdiction—and significant direct or incidental adverse effects—by anticipating, identifying and assessing the effects of designated projects in order to inform decision-making under the *Impact Assessment Act* (IAA). The Joint Assessment Committee (the Committee), composed of representatives from IAAC and the Cree Nation Government, developed these Draft Tailored Impact Statement Guidelines for the Shaakichiuwaanaan Mining Project (the Project) proposed by Patriot Battery Metals (the proponent). The committee will use the proponent's Impact Statement along with other available information received during the impact assessment process to prepare an Impact Assessment Report.

The Guidelines identify information and studies the committee considers necessary for the conduct of the impact assessment based on adverse effects within federal jurisdiction, or direct or incidental adverse effects (collectively referred to as adverse federal effects hereafter) that could potentially be significant. The tailoring of this document is based on the nature, complexity and context of the Project, and was informed by consultation and engagement with Indigenous groups, the public, and federal authorities, and by information provided by the proponent.

1.1 Scope of the Impact Assessment

In determining what information and studies are required in the proponent's Impact Statement for the federal impact assessment process, the committee took into account the factors listed in subsection 22(1) of the IAA.

In support of the Government of Canada's objective to promote the principle of "one project, one assessment", these Guidelines identify sections where the federal impact assessment and the Province of Quebec's environmental and social assessment process have similar information requirements. The committee referred to the [Directive pour le Projet minier Corvette \(French only\)](#) (Corvette is the former name of the Project) issued by the Environmental and Social Impact Evaluating Committee (COMEV), hereafter referred to as the COMEV directive, in developing these Guidelines.

Moreover, the COMEV Directive refers to several other documents (directives and guides), including the *Directive 019 sur l'industrie minière* (French only), which serves as a framework in the preparation of the impact statement. The guidelines do not refer directly to these other documents. However, when the guidelines refer to the COMEV Directive and the latter refers to other documents, the proponent must also follow them and submit the information required in these other documents in the impact statement



1.2 Selection of Valued Components

The impact assessment focuses on the Valued Components (VCs) whose analysis is anticipated to be material for decision-making under the IAA. The VCs serve as the focal points for the Impact Statement and will feed into the conclusions of the Impact Assessment Report. Each VC must be assessed following the [Generic Requirements for Impact Statements](#), as well as VC-specific requirements presented in the Guidelines. The assessment of effects on VCs includes the assessment of the likely pathways of effects that are cause-effect linkages between a project component or activity and the VC.

The Impact Statement must include, at minimum, the following VCs:

Valued Components selected	Rationale for inclusion
Valued Components for the assessment of adverse effects within federal jurisdiction, as defined in section 2 of the IAA	
Fish and fish habitat	Physical modifications to aquatic habitat could have potential adverse effects on fish and fish habitat through habitat destruction and loss, habitat alteration and disruption, relocation and possibly fish mortality. Alterations to water quality and quantity through physicochemical changes, contaminant release and sensory disturbance (vibration and explosion) could also have adverse effects on fish and fish habitat.
Migratory birds	Habitat loss and fragmentation, destruction of nests and eggs, sensory disturbance from noise, vibrations and light, changes in air and water quality and increased risk of collision mortality could all have adverse effects on migratory birds.
Indigenous Peoples' physical and cultural heritage, and structures, sites or things of historical, archaeological, paleontological or architectural significance.	Excavation work and the construction of new infrastructure could have an adverse impact on sites of historical and archaeological significance to Indigenous Peoples.
Current use of lands and resources for traditional purposes by Indigenous Peoples.	Changes to the terrestrial environment could adversely affect traditional caribou hunting, while changes to the aquatic environment could adversely affect traditional fishing and boating.
Health, social and economic conditions of Indigenous Peoples.	Construction and operation activities could have adverse effects on the health and physical, mental and social well-being of Indigenous Peoples, particularly as a result of air emissions, changes to water quality,



	increased noise and light levels, and increased risk of gender-based violence. The Project could revive certain traumas caused by hydroelectric developments, impact social cohesion, generate stress and exacerbate some social issues in the community.
Additional Valued Components for elements of the decision under section 63 of the IAA	
Job creation	The Project could generate job opportunities that would contribute to sustainability.
Clean energy transition	The Project's effects could contribute to the development of renewable energies.
Economic partnerships	The Project could lead to economic partnerships that benefit local communities and contribute to sustainability.

The proponent may select additional VCs, in consultation with Indigenous groups and participants, and in consideration of Indigenous Knowledge and community knowledge. The Impact Statement must provide a justification if a VC suggested by an Indigenous group is excluded from the Impact Statement.

1.3 Preparing the Impact Statement

In preparing the Impact Statement, the proponent must adhere to ethical guidelines and cultural protocols governing research, data collection and confidentiality. The proponent must respect the obligation to protect personal information, including for disaggregated data from various population groups, and adopt the established standards for the management of Indigenous data (e.g. [First Nations principles of Ownership, Control, Access and Possession](#) or standards adopted by an Indigenous group). The committee recommends the Impact Statement follow the structure of the Guidelines or provide a table of concordance that indicates where in the Impact Statement the information set out in these Guidelines has been provided.

The Impact Statement must meet all the requirements set out in the Guidelines, including those referring to the requirements of the COMEV directive. The Impact Statement must also meet the requirements outlined in the [Generic Requirements for Impact Statements](#). The proponent may submit a single document that meets both the committee and COMEV requirements.

Where the proponent is of the opinion that the information is not required, it should contact the committee prior to submitting the Impact Statement to confirm whether its rationale for excluding the information is appropriate. The rationale must also be provided in the Impact Statement. As applicable, the proponent is also encouraged to refer to the requirements of other jurisdictions to assess effects, as well as to the means of other jurisdictions to address the Project's effects and to report in the Impact Statement how these were



leveraged to assess effects. The proponent should also notify the committee of any changes made to the Project relative to the Initial Project Description.

The Impact Statement must take into account, where relevant:

- any relevant regional or strategic assessment;
- any relevant assessment of the Project's effects that is conducted by or on behalf of an Indigenous governing body and that is provided to the proponent with respect to the Project;
- any study or plan that is prepared by a jurisdiction—or an Indigenous governing body—in respect of the region related to the Project and that is provided to the proponent with respect to the Project;
- Indigenous Knowledge, community knowledge, as well comments received from Indigenous groups, the public and others; and
- Gender-based Analysis Plus (GBA Plus), in the context of an impact assessment, as an analytical tool and process that examines how sex and gender intersect with other identity factors to assess who might be disproportionately affected by a project and how they might experience the impacts differently. GBA Plus helps identify the experiences and needs of various population groups, and guides strategies to mitigate barriers and promote equitable access to project benefits.

The proponent is encouraged to engage the committee as early as possible to clarify the requirements in the Guidelines and to support early resolution of issues. IAAC may establish technical advisory groups consisting of Indigenous groups, federal authorities or others. The proponent is also encouraged to submit draft documents for review by IAAC (e.g. proposed study plans, draft sections of the Impact Statement) prior to submitting the formal Impact Statement.

1.4 Federal permitting coordination

IAAC will provide coordination of federal permits, licences or authorizations (collectively called permits) early on and throughout the impact assessment process to meet the objectives of:

- clarity on permitting requirements, timelines and processes through the development of a detailed federal permitting plan; and
- transparency on the status and progress of permits through public reporting on the Registry.

Federal authorities are prohibited from issuing permits, licences and authorizations until the impact assessment process has been completed. However, the proponent is encouraged to develop and/or apply for federal permits early on in the impact assessment process. Information, engagement and consultation requirements for permits may be completed at the same time as the impact assessment and, where applicable, the same information can be used for both processes. Collecting and providing permitting information during the impact assessment process may expedite subsequent federal decisions, should the impact assessment decision be positive.



2. Project description

2.1 Project overview

The Project subject to the impact assessment includes the designated physical activities and any incidental physical activities. The proponent must describe the Project, presenting the main components of the Project and associated activities, details of their scheduling, the timing of each phase, the total lifespan of the Project and other essential characteristics. If the Project is to be developed in phases, information on progressive and phased development must be described.

2.2 Receiving environment

The Impact Statement must describe the geographical setting and context in which the Project will be carried out, in order to understand the Project's potential effects and impacts on the environment, health, society and economy. To this end, the proponent must refer to the requirements of the COMEV directive, specifically sections 3. *Description du projet* (French only) and 4. *Description du milieu* (French only).

The Impact Statement must also specify the location of any federal lands in the study area, as well as the distance between the project components and federal lands, including Reserve lands or lands to be added to a Reserve, within the meaning of subsection 2(1) of the *Indian Act*.

2.3 Project components and activities

The Impact Statement must describe project components and activities to be carried out during each project phase, and provide sufficient detail to understand the potential environmental, health, social and economic effects of the Project, as well as the impacts on Indigenous Peoples and their rights, as determined by Indigenous groups. To this end, the proponent must refer to the requirements of the COMEV directive in sections 1. *Mise en contexte* (French only) and 3. *Description du projet* (French only).

The description of the planned components and activities must include the following:

2.3.1 Project components at the mine site

- the roads and culverts at the mine site to allow for movement of the mining equipment fleet;
- the workers camp at the mine site, for the construction and operation of the mine;
- the open-pit and underground mining infrastructure;
- the storage areas for waste rock, tailings and ore;
- the dams to isolate the open pit from Lake 01;



- the diversion channel;
- the electrical substation and distribution network at the mine site;
- the ore processing plant;
- the paste backfill plant;
- the water treatment plant;
- the water management infrastructure (ditch, basin, etc.);
- the explosive emulsion plant and storage magazines;
- the garage and other ancillary buildings;
- the fuel storage area and refuelling station; and
- any other infrastructure relevant to the Project.

2.3.2 Project activities

2.3.2.1 Site preparation and construction

- clearing, topsoil stripping, levelling and earthworks (cut and/or fill depending on local topography);
- production of concrete and washing of concrete mixers;
- construction of temporary or permanent infrastructure;
- construction of temporary roads and haul roads;
- construction of mine waste management infrastructure (e.g., storage areas for waste rock, tailings and ore, etc.);
- blasting;
- transport, storage and management of explosives on site;
- the draining of part of Lake 01;
- construction of water crossings (temporary or permanent);
- water management, and sediment and erosion control during construction;
- construction of infrastructure to manage surface runoff and site drainage, as well as infrastructure to manage contact water, infiltration, drainage or treatment processes;
- wastewater management and treatment;
- operation and maintenance of light, heavy and mobile off-road power equipment;
- storage, management and disposal of combustible materials and hazardous waste; and
- management and disposal of non-hazardous residual materials

2.3.2.2 Operation

- ore extraction, processing and treatment;



- drilling and blasting;
- storage and use of explosives;
- use and maintenance of haul roads;
- mine waste management (including tailings, waste rock and overburden);
- wastewater management;
- storage, handling and transportation of materials on site;
- storage and handling of reagents, petroleum products, chemicals, hazardous materials and residual materials; and
- management and recycling of non-mining waste (types of waste, disposal methods, quantities, disposal sites or facilities).

2.3.2.3 Decommissioning and abandonment

- site closure, rehabilitation and restoration (mine waste storage areas, open pit, underground infrastructure, various buildings);
- infrastructure dismantling;
- dismantling and removal of equipment;
- long-term maintenance, monitoring and upkeep of site integrity, including site drainage, water and effluent management and any remaining structures; and
- closure of temporary or permanent facilities, or suspension of operations.

2.4 Project purpose, need and alternatives considered

The proponent must explain the purpose and need for the Project and provide information on alternatives to the Project.

2.4.1 Purpose and need for the Project

To explain the purpose and need for the Project, the proponent must refer to the COMEV directive in section 1.3 *Raison d'être du projet* (French only)

2.4.2 Alternative means of carrying out the Project

To provide information on alternative means of carrying out the Project, the proponent must refer to the COMEV directive in section 2. *Choix des variantes d'emplacement et de technologie* (French only).

In addition, in justifying its alternatives, the proponent must consider the effects and impacts on Indigenous Peoples and their rights, and the effects on species at risk. The proponent must carry out this analysis for the main components of its project, taking into account the scope of the federal impact assessment.



3. Fish and their habitat

The Impact Statement must assess Project's effects on fish and fish habitat, as defined in subsection 2(1) of the *Fisheries Act* based on likely [pathways of effects](#). The spatial scale and pathway of effects will dictate the appropriate fish and fish habitat assessment methods, such as quantifying habitat loss and/or considering long-term population viability.

Where *Fisheries Act* authorization(s) under section 34.4(2)(b) or 35(2)(b) of the *Fisheries Act* are likely required for the project, the proponent is encouraged to provide the information required for permitting during the impact assessment in support of an efficient and shortened permitting approval process, and refer to [Project Planning: Applying for a Fisheries Act Authorization](#) and the [Applicant's Guide Supporting the Authorizations Concerning Fish and Fish Habitat Protection Regulations](#).

If a regulatory amendment is required to list fish-bearing water in Schedule 2 of the *Metal and Diamond Mining Effluent Regulations* (MDMER) is required, providing the required information during the impact assessment, in accordance with the guidelines and policies of Environment and Climate Change Canada (ECCC) and Fisheries and Oceans Canada (DFO), can reduce the time needed to obtain an amendment to Schedule 2 of the *Metal and Diamond Mining Effluent Regulations*. For more information, the proponent should consult the [Guide to the Regulatory Process for Listing Water Bodies Frequented by Fish in Schedule 2 of the Metal and Diamond Mining Effluent Regulations](#).

To support impact assessment and permitting processes, where it is not possible to eliminate, reduce, or control adverse effects on fish and fish habitat, the Impact Statement must describe offset measures which may include restoration of degraded fish habitat, habitat enhancement or construction, or stocking, referring to the [Policy for Applying Measures to Offset Harmful Impacts to Fish and Fish Habitat](#).

3.1 Groundwater and surface water baseline conditions as pathways of effects on fish and fish habitat

To describe the baseline conditions for groundwater and surface water, the proponent must refer to the requirements of the COMEV directive in section 4.2 *Description du milieu* and the documents referred to therein (French only). These requirements cover, among other things, the delineation and characterization of wetlands and water bodies (including sediment characteristics), hydrogeological characterization, uses of watercourses and water bodies, aquatic and riparian vegetation, as well as several elements specific to dikes and watercourse diversion.

3.2 Baseline conditions for fish and fish habitat

To describe the baseline conditions for fish and fish habitat, the proponent must refer to the requirements of the COMEV directive in section 4.2 *Description du milieu* (French only) and the documents referred to



therein. These requirements include, among other things, the identification and description of fish species and their habitats.

In addition to the information required in the COMEV directive, and more specifically, for water bodies and watercourses (permanent and intermittent) frequented by fish and likely to be affected by the Project, the description of fish populations must include their life cycle. Also, the description of potential and confirmed fish habitats must include a characterization of their function (feeding, reproduction, rearing, shelter, growth, migration) and quality according to the species present. For each water body and watercourse frequented by fish and likely to be affected by the Project, the impact statement must present maps at appropriate scales using aerial imagery overlaid with relevant descriptions, as well as summary tables of baseline conditions for fish and fish habitat.

Please note that intermittent and ephemeral watercourses and water bodies must be included in the impact assessment, as they may constitute or contribute to fish habitat. The absence of fish or water at the time of the survey does not constitute evidence of the absence of fish and/or fish habitat. Finally, beaver dams and/or accumulations of woody debris do not constitute impassable barriers to fish, and therefore cannot be used as justification for a watercourse or water body not being considered as fish habitat.

The Impact Statement must also provide a list of aquatic species listed in Schedule 1 of the *Species at Risk Act* (SARA) likely to be present, such as lake sturgeon, southern Hudson Bay and James Bay populations, and provide the location and description of these species' habitat (residence and critical habitat) in or near the study areas. The proponent is also encouraged to include other species assessed by Committee on the Status of Endangered Wildlife in Canada (COSEWIC).

3.3 Effects on groundwater and surface water as a pathway of effects on fish and fish habitat

To describe the Project's effects on groundwater and surface water, the proponent must refer to the COMEV directive in section 5.1 *Détermination et évaluation des impacts* (French only), and the documents referred to therein. These requirements cover, among other things, the Project's effects on water quality and quantity, the water table and wetlands, as well as the effects of dikes and watercourse diversion. The assessment of effects on water must also include a water balance (section 3.5.1 of the COMEV directive) and hydrogeological modelling (Directive 019).

The Impact Statement must also include a characterization and description of mine materials and their management. To this end, the proponent must refer to the requirements of the COMEV directive in section 3.4 *Gestion des résidus miniers et des stériles* (French only), and the documents referred to therein.

The characterization and description of tailings and waste rock must differentiate between types of tailings (e.g., coarse, low lithium content). In addition, because the overburden will be used as a construction material, it must be characterized in accordance with the recommendations of the [Guide de caractérisation des résidus miniers et du minéral](#) (French only), to which the COMEV directive refers. The description of the



mine materials must include a characterization of samples taken at the approximate locations of the future open pit wall. In addition, the description of the chemical composition of mine materials must include all potential metals of concern.

3.4 Effects on fish and fish habitat

The proponent must refer to the requirements of the COMEV directive in section 5.1 *Détermination et évaluation des impacts* (French only) and the documents referred to therein to describe potential effects on fish and fish habitat. These requirements include, among other things, the Project's effects on fish populations and their habitats, including fish survival and movement, and habitat alteration or destruction. The requirements also include several types of effects resulting from dikes and water diversion that must be analyzed and presented in the impact statement.

In addition to the information required by the COMEV directive, and more specifically, the Impact Statement must include an assessment of the potential effects on the life cycle of the fish species present. In addition, the assessment of effects on fish and fish habitat must consider:

- changes to groundwater and surface water reference conditions (e.g., surface water flows, hydraulic connectivity, groundwater-surface water exchanges, physicochemical parameters)
- the risk of introducing aquatic invasive species;
- the increase in fishing in the study areas;
- [sensitive periods](#) for fish;
- the potential effects of noise and vibrations;
- the likely effects on aquatic species at risk listed on Schedule 1 of SARA, notably lake sturgeon, southern Hudson Bay and James Bay population, and the objectives of management plans, recovery strategies and action plans for those species. The proponent is also encouraged to include species assessed by COSEWIC.



4 Migratory birds

The Impact Statement must describe and characterize the effects of the Project on migratory birds as defined in the *Migratory Birds Convention Act, 1994*. Among the bird species likely to be present, the proponent may select birds or groups of birds to be used as indicators for assessing the effects. The proponent must select these birds or groups of birds considering that different species and groups of species may be affected differently by the Project and may require different mitigation measures. The Impact Statement must also address each of the migratory bird species at risk under SARA likely present in the Project's region and likely to be affected by the Project, including:

- Harlequin Duck, Eastern population;
- Red Crossbill, subspecies *percna*;
- Common Nighthawk;
- Barrow's Goldeneye, Eastern population;
- Bank Swallow;
- Olive-sided Flycatcher; and
- Yellow Rail.

4.1 Baseline conditions

To describe the baseline conditions for migratory birds or groups of birds and their habitats, the proponent must refer to the requirements of the COMEV directive in section 4.2 *Description du milieu* (French only). These requirements include, among other things, the description of the bird species present and their habitats, and the mapping information required.

In addition to the information required in the COMEV directive and, more specifically, for the selected migratory birds, the Impact Statement must:

- describe their population, distribution, seasonal ranges, migrations, movements, habitat use for relevant life cycle stage and sensitive periods. These descriptions must include estimates of abundance or density, where available;
- identify sites that are likely to be sensitive habitats for birds or environmentally significant areas (e.g., Migratory Bird Sanctuaries or other priority areas or sanctuaries for birds, and National Wildlife Areas); and
- if it is a species at risk:
 - describe and locate on a map at an appropriate scale the potential habitats, as well as the residences and critical habitat, if any, of each species;
 - if surveys are carried out, also identify on a map the locations of these surveys and mentions of the species identified; and



- describe the threats and conservation or management objectives applicable to the recovery programs or management plans.

In addition, the proponent must justify whether existing information and recent studies are sufficient to support the assessment of the Project's effects on migratory birds, taking into account the uncertainties and bias of these sources. If existing information is not sufficient, the proponent must conduct surveys, including:

- targeted surveys to better determine the presence or location of migratory birds at risk where unique mitigation measures or follow-up could be required;
- field habitat characterizations to identify rare or important habitats for different stages of the bird's life cycle (e.g., nesting), and habitats for migratory birds at risk; and
- surveys where risk or uncertainty related to effects on birds are moderate to high, or where bird presence, population or distribution is poorly understood. Such surveys would greatly inform the assessment of effects.

4.2 Effects on migratory birds

For the assessment of effects on migratory birds, the proponent must refer to the requirements of the COMEV directive in section 5.1 *Détermination et évaluation des impacts* (French only). These requirements cover, among other things, the survival and movements of birds, the destruction or modification of their habitats, and species at risk and their habitats.

In addition to the information required in the COMEV directive and, more specifically, for the selected migratory birds, the Impact Statement must describe:

- the potential pathways of effects on birds. The proponent must consider the potential for mortality (e.g., collisions, predators, interactions with tailings ponds) and disturbance (e.g., light, noise, vibration, air emissions, dust and the disturbance caused by the presence of workers);
- effects of changes to bird habitat (e.g., degradation, destruction) and effects on critical habitat of species at risk. This includes a quantification of habitat loss relative to habitat availability in or near the study area, for each migratory bird species at risk, as well as an illustrative mapping of this effect including the facility footprint.



5 Indigenous Peoples

The Impact Statement must demonstrate how impacts on Indigenous Peoples were considered and assessed, including:

- impacts resulting from any change to the environment on the physical and cultural heritage, the current use of lands and resources for traditional purposes, or any structure, site or thing of historical, archaeological, paleontological or architectural significance;
- any changes to their health, social or economic conditions; and
- impacts on their rights.

Indigenous groups are best placed to understand how a project may impact them. The assessment of impacts on Indigenous Peoples and their rights must be carried out in collaboration with Indigenous groups, as outlined in the section Indigenous engagement, in the [Generic Requirements for Impact Statements](#). The proponent must collaborate with Indigenous groups to incorporate information from or about them into the assessment of effects on VCs (e.g., biophysical VCs). Thus, the proponent must respect the preferences of each Indigenous group for assessing impacts and discuss with each of them whether it is appropriate to provide its conclusions regarding impacts (residual and cumulative) on Indigenous Peoples and their rights. If an Indigenous group has provided its own conclusion, the proponent may use it in its Impact Statement. Where the proponent's conclusions differ from those of Indigenous groups, they must be clearly documented and justified.

The proponent is expected to engage with all Indigenous groups identified in the Indigenous Engagement and Partnership Plan (IEPP) and to describe the outcomes of that engagement in the Impact Statement. In addition, the results of engagement must be analyzed and presented separately for each Indigenous group. This group-specific assessment does not need to repeat the entire analysis of each VC but should summarize and present the relevant information for each Indigenous group. To the extent possible, each group-specific assessment must be carried out in the manner that works best for that Indigenous group.

At the request of Indigenous groups, all or parts of the assessment of impacts on Indigenous Peoples and their rights can be combined in a group-specific assessment. For example, effects on the current use of lands and resources for traditional purposes and impacts on hunting, fishing and trapping rights can be assessed together. Indigenous groups may also identify holistic VCs that encompass several environmental, health, social or economic components. Undertaking these assessments together, when requested, will support consistent conclusions. In all cases, the Impact Statement must demonstrate that all requirements have been met.

The proponent must pay particular attention to the pathway of effects, i.e., the changes to the environment that the Project could cause (e.g., air quality, wildlife), and the impacts of these changes on Indigenous physical and cultural heritage, on structures, sites or things of significance, on the current use of lands and resources for traditional purposes, and on health, social or economic conditions of Indigenous Peoples.



5.1 Indigenous physical and cultural heritage and structures, sites or things of significance

The Impact Statement must assess and clearly distinguish the impacts of the Project on physical and cultural heritage from its impacts on structures, sites or things of significance in terms of history, archeology, paleontology, or architecture of Indigenous Peoples. The proponent must take into account the considerations set out in the [Technical Guidance for Assessing Physical and Cultural Heritage or any Structure, Site or Thing](#).

5.1.1 Baseline conditions

The Impact Statement must:

- describe the baseline conditions associated with physical and cultural heritage, and with structures, sites or things of significance to Indigenous Peoples;
- describe how past and present developments have affected physical and cultural heritage and the ability to transmit culture; and
- indicate the location of physical and cultural heritage features on maps, if Indigenous groups have shared this information with the proponent and authorized their publication (if required, a coarser geographic resolution can be presented).

Information about heritage and structures, sites or things of significance to Indigenous groups, including information identified by Indigenous groups, may include, but is not limited to:

- places of spiritual value, including water bodies and watercourses (particularly the La Grande River watershed);
- landscapes, places, plants, animals (including the woodland caribou, boreal population), objects, persons or features that are sacred, ceremonial or culturally significant; and
- other environmental components identified by Indigenous groups as having heritage value.

Woodland caribou, boreal population, is a species of importance to Indigenous Peoples, both in terms of cultural heritage and in terms of the current use of resources for traditional purposes. To inform the impact assessment for caribou-related VCs, the Impact Statement must provide information on the baseline conditions of the woodland caribou, boreal population. To this end, the proponent must refer to the requirements of the COMEV directive. The proponent must also refer to the [Amended Recovery Strategy for the Woodland Caribou \(*Rangifer tarandus caribou*\), Boreal Population, in Canada 2020](#) to complete its description of baseline conditions specific to boreal caribou in a manner consistent with the latter.



5.1.2 Effects on Indigenous physical and cultural heritage and structures, sites or things of significance

The Impact Statement must:

- assess the potential effects on Indigenous groups' physical and cultural heritage, as well as on buildings, sites or things of historical, archaeological, paleontological or architectural significance, including:
 - loss, change, or destruction of physical and cultural heritage, including the pathways of effects associated to the woodland caribou and to the La Grande River watershed;
 - changes to access to physical and cultural heritage sites;
 - changes to the cultural value, spirituality or importance associated with physical and cultural heritage;
 - changes to sacred, ceremonial or culturally significant places, objects or things, languages, histories, cultural transmission and traditions; and
 - changes to visual aesthetics over the life of the Project and after project decommissioning.
- assess any other effects highlighted by Indigenous groups; and
- provide copies of correspondence with provincial, territorial or Indigenous authorities responsible for heritage resources with comments on any physical and cultural heritage resource assessment.

5.2 Current use of lands and resources for traditional purposes

The Impact Statement must assess the impacts of the Project to the current use of lands and resources for traditional purposes. The analysis must align with the steps set out in the [Technical Guidance for Assessing the Current Use of Lands and Resources for Traditional Purposes under CEAA, 2012](#).

5.2.1 Baseline conditions

When information is provided and validated by Indigenous groups, the Impact Statement must describe baseline conditions related to the current use of lands and resources for traditional purposes, including:

- lands covered by treaties, title areas, land claims or traditional territories (including maps);
- how past and present developments have affected current use of lands and resources;
- reserves and communities;
- Indigenous conservation and protected areas;
- Indigenous governance systems and Indigenous laws associated with the current use of lands and resources for traditional purposes;



- traditional activities presently or historically practised (e.g. hunting, fishing, trapping, gathering of plants or medicinal resources, access or travel routes);
- baseline conditions for elements likely to have a pathway of effects on the current use of lands and resources by Indigenous Peoples, with sufficient detail to support the impact assessment, including:
 - species use (magnitude, timing) and availability as country foods or for other traditional purposes. Include a description of each species of importance, including lake sturgeon, woodland caribou (boreal population), moose, bear, goose and beaver, and whether their consumption has cultural importance for Indigenous communities, including for medicinal purposes. To describe wildlife resources, with the exception of fish and birds, the proponent must refer to the requirements of the COMEV directive, specifically section 4.2 *Description du milieu* (French only);
 - for fish and birds, refer to the requirements of the section on fish and fish habitat and the section on migratory birds in the Guidelines;
 - wherever possible, sites used in the study areas or historically important sites for the collection of country foods must be identified and mapped, such as important fishing sites; and
 - navigable waters and their uses, navigable water users, and existing concerns regarding navigable water use and access;
- any other current uses identified by Indigenous groups.

5.2.2 Effects on current use of lands and resources for traditional purposes

The Impact Statement must assess the Project's potential effects on current use of lands and resources for traditional purposes, within the context of historical and current cumulative effects and taking into account likely pathways of effects. This includes changes to:

- quality, perception of quality and quantity of resources, and access to them;
 - With regard to the effects on terrestrial wildlife of importance to Indigenous Peoples, including the woodland caribou, the Impact Statement must refer to the requirements of the COMEV directive in section 5.1 *Détermination et évaluation des impacts* (French only) to describe and assess the Project's effects on terrestrial wildlife and its habitat;
 - For the woodland caribou (boreal population), the assessment of the Project's effects on the species must take into account the current state of decline as well as the historical state of the population. It must also report on how the Project and the mitigation measures will be consistent with the [Amended Recovery Strategy for the Woodland Caribou \(*Rangifer tarandus caribou*\), Boreal Population, in Canada 2020](#);
- the location, frequency, duration or timing of fishing, hunting, trapping, gathering, cultural or ceremonial activities and other traditional practices, including any avoidance of resources due to perceived quality;
- the economic burden and increased time for travelling further to hunt, fish, trap and gather;



- Indigenous groups' efforts to restore traditional practices;
- the experience of being on the land (e.g. sensory and visual disturbance, fragmentation of traditional territory, and any impact on well-being resulting from sensory changes);
- the use of riverbanks, travel ways, navigable waterways and water bodies, including for social and ceremonial purposes, travel or recreation; and
- any other uses identified by Indigenous groups.

The Impact Statement must also describe the effects on navigation and navigation safety arising from the following components and activities:

- project components to be built in navigable waters; and
- mining operations that could have an indirect effect on navigable waters.

5.3 Health, social and economic conditions of Indigenous Peoples

Baseline conditions should present health, social and economic conditions in a community-specific way, using disaggregated data where available. Baseline conditions established for Indigenous communities must take into account Indigenous governance regimes and Indigenous laws associated with health and socio-economic conditions.

The proponent should consult the following guidance and reference documents:

- [Analyzing Health, Social and Economic Effects under the Impact Assessment Act](#);
- [Tools and approaches for assessing and supporting public health action on the social determinants of health and health equity](#);
- [Reclaiming Power and Place: The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls](#), in particular, Calls for Justice targeting the extractive and development industries (Calls for Justice 13.1 to 13.5); and
- [Indigenous Mental Wellness and Major Project Development - Guidance for Impact Assessment Professionals and Indigenous Communities](#).

5.3.1 Baseline health conditions

The Impact Statement must describe the current state of physical, mental and social well-being. The Impact Statement must:

- develop community health profiles using the definitions of physical, mental and social health and well-being specific to each Indigenous community consulted, where information is available;
- describe the factors contributing to community health that are of interest to Indigenous Peoples, including factors contributing to community resilience and well-being;



- identify and describe the biophysical and social determinants of health relevant to the Project and Indigenous communities. At the biophysical level, provide the approximate location and distance of likely human receptors (including the Cree camps), including foreseeable future and sensitive receptors, that may be affected by changes in air quality, water quality, country foods, and noise and light levels. At the social level, describe access to health and social services, community support networks, and perceived and actual safety in and around the mining industries;
- describe sources of drinking water and water used for recreational or cultural purposes;
- describe the level of food security and food sovereignty in Indigenous communities. For further information, please refer to the Public Health Agency of Canada's Food Security website and the [First Nations Food, Nutrition and Environment Study](#).
- describe Indigenous Peoples' access to and consumption of country foods as a health-related behaviour (e.g., site-specific consumption studies, [First Nations Food, Nutrition and Environment Study](#)); and
- provide baseline concentration of contaminants in air, drinking water, soil and sediments (the proponent must refer to the requirements of the COMEV directive, see sections 4.2.1 and 4.2.2);
 - For country foods used and consumed by Indigenous communities, the proponent must first identify the species or resources for which there is a potential risk of increased contaminant levels, in collaboration with the Indigenous communities potentially affected. If a potential risk is identified, the proponent must assess this risk. The proponent must determine and justify whether existing baseline data can be used, or whether tissue or resource samples should be collected and, if so, determine the best sampling method in collaboration with Indigenous communities.

5.3.2 Baseline social conditions

The Impact Statement must include community profiles to understand the context of each Indigenous community. These profiles must include:

- a demographic profile of each Indigenous community consulted, and a list of important socio-cultural values;
- a "Community Well-Being Index" profile for each Indigenous community, using data publicly available on the Indigenous Services Canada website: [Community Well-Being index](#);
- the psycho-social and socio-cultural environment;
- the relevant historical background of the communities;
- applicable history relating to previous proponents and environmental liabilities, including hydroelectric projects (impacted water bodies, contamination thresholds, fish consumption recommendations, etc.); and
- any other factors relevant to the Indigenous groups consulted.

The Impact Statement must describe existing local and regional services and infrastructure in the study areas and their capacity, insofar as they relate to the social and health conditions of Indigenous communities.



5.3.3 Baseline economic conditions

The Impact Statement must describe:

- the main economic activities of Indigenous Peoples in the study areas, including a description of the use of lands and water bodies for economic purposes;
- an overview of Indigenous businesses that are likely to provide supplies and services required for the Project;
- information on economically active members, including an overview of Indigenous participation in the local and regional workforce;
- the availability of skilled and unskilled workers, and conditions influencing workforce availability during the project timeline;
- workforce development and training plans for Indigenous Peoples;
- barriers to employment and/or participation in the labour market;
- Indigenous or federal economic development plans for the study areas; and
- relevant treaty provisions pertaining to economic activities for Indigenous Peoples.

5.4 Effects on the health, social and economic conditions of Indigenous Peoples

The proponent must assess the Project's effects on human health and on the social and economic conditions of potentially affected Indigenous communities. The proponent is encouraged to facilitate the conduct of this assessment by the communities concerned. Given the holistic nature of First Nations health and well-being, all aspects presented in the guidelines that may influence health and well-being must be taken into account in this assessment (e.g., Indigenous physical and cultural heritage, current use of lands and resources, health, social and economic conditions). The Impact Statement must describe the interactions and interconnections between these effects and other VCs.

5.4.1 Effects on health conditions

The Impact Statement must:

- present a health impact assessment, including biophysical and social determinants of health;
- determine whether a human health risk assessment (HHRA) is required, taking into account the following elements:
 - current and future contaminants of potential concern (COPC);
 - current and future human receptors;
 - current and future exposure pathways; and



- a conceptual site model illustrating the links between COPCs, human receptors and exposure pathways;
- if an HHRA is not carried out, provide a rationale for not doing so; and
- if an HHRA is performed, assess all COPC exposure pathways and consider a multimedia HHRA for contaminants with multiple pathways.

The proponent should refer to the Interim [Guidance for Health Impact Assessment of Designated Projects under the *Impact Assessment Act*](#) and to Health Canada's [Guidance for Evaluating Human Health Effects in Impact Assessment: Human Health Risk Assessment](#).

5.4.1.1 Biophysical determinants of health

The Impact Statement must:

- provide an assessment of the potential effects on the health of Indigenous communities, taking into account, in particular, potential changes to:
 - air quality, noise exposure and vibration effects. To describe the atmospheric environment, the proponent must refer to the requirements of the COMEV directive, in particular section 5.1 *Détermination et évaluation des impacts* (French only);
 - ambient light;
 - the accessibility, availability, and current and future quality of country foods;
 - drinking water and water used for recreational and cultural purposes; and
 - any other effects identified by Indigenous groups, if applicable;
- assess the cancer risks associated with human exposure to all the potentially carcinogenic polycyclic aromatic hydrocarbons present in the diesel mixture, and characterize the carcinogenic risk of diesel exhaust;
- provide a justification if it is determined that an assessment of the potential for contamination of country foods is not necessary, or for any COPC¹ or non-negligible exposure pathways that would be excluded and/or eliminated from the HHRA;
- document and take into account tolerance thresholds for potential adverse effects on health defined by Indigenous Peoples; and
- describe any project-related changes that could have a positive impact on health (e.g., remediation projects).

¹ COPC: Any chemical substance whose concentration in an environmental medium is likely to be elevated as a result of project activities may be considered a COPC in the first instance. However, if it is determined that the sum of modelled and background concentrations is below the guidelines, standards or criteria—based on health protection—of the affected environment, the problem statement stage of the risk assessment may conclude that it is not necessary to treat this chemical as a COPC in a quantitative risk assessment.



5.4.1.2 Social determinants of health

The Impact Statement must assess the impacts on the health of Indigenous Peoples from key social determinants of health, including those described in sections 5.4.2 and 5.4.3 of the guidelines, in addition to psychosocial factors such as:

- perceived risks to human health and potential avoidance of certain places, water sources or foods due to perceived contamination;
- the resilience of Indigenous communities (e.g., due to changes in the relationship with the land, the role of stewardship, cultural continuity);
- public safety concerns (e.g., risks of accidents or malfunctions related to project activities); and
- disruption of daily activities.

5.4.2 Effects on social conditions

5.4.2.1 Effects on community well-being

The Impact Statement must:

- assess the potential effects on community well-being taking into account:
 - changes to food security (including country food), income inequity and the cost of living;
 - changes resulting from population increase, particularly in terms of accessibility to housing and basic goods and services;
 - risks associated with the disruption of community, family and household cohesion; and
 - the main sectors of local economic activity, including traditional economic sectors;
- assess effects on access, ownership and use of resources (land, minerals, infrastructure, etc.); and
- describe workforce interactions with Indigenous communities, including differential impacts, particularly on women and girls, in the context of the [National Inquiry into Missing and Murdered Indigenous Women and Girls](#).

The Impact Statement must describe the anticipated positive and adverse effects on local and regional services and infrastructure, including access to these services and infrastructure in the study areas insofar as they are related to social conditions.

5.4.3 Effects on economic conditions

The Impact Statement must:

- describe potential changes in employment for Indigenous communities, by breaking down the data to show, for each stage of the project, the number of positions available by type of job (e.g., permanent or temporary; part-time or full-time; contract or employee; role and skills required);
- describe potential changes in training opportunities for Indigenous communities;



- estimate the capacity of the local and regional market to meet the demand for employees, and describe the potential risks of labour shortages, taking into account the different phases of the Project and other projects in the region;
- indicate and describe, if applicable and if the communities concerned have agreed to share this information, any agreements concluded or planned with Indigenous groups on economic benefits;
- provide an estimate of the anticipated levels of economic participation for Indigenous groups in comparison to the total Project requirements (e.g., total dollar value of contracts);
- describe the situations where the Project could directly or indirectly create economic hardship or opportunities, such as job losses or the displacement of businesses to Indigenous communities near the site; and
- describe any other effects identified by Indigenous groups, if applicable.

The economic information provided will be made available to the public and must not contain any confidential business information.

5.5 Rights and values of Indigenous Peoples

The *Impact Assessment Act* affirms the Government of Canada's commitment to ensure respect for the rights and treaties of Indigenous Peoples of Canada, as recognized and affirmed by section 35 of the *Constitution Act, 1982*. The proponent is encouraged to refer to IAAC's [Guidance: Assessment of Potential Impacts on the Rights of Indigenous Peoples](#), [Policy Context: Assessment of Potential Impacts on the Rights of Indigenous Peoples](#) and IAAC's Indigenous Advisory Committee [Principles to Guide the Assessment of Impacts to Indigenous Inherent and Treaty Rights](#).

The values of Indigenous groups form the basis for and illustrate the exercise of these rights. These values, shaped by Indigenous Knowledge, tradition, culture, and spirituality, emphasize the protection of the environment and social environment, the protection of traditional ways of life, access to territory, and sustainable development.

5.5.1 Baseline conditions

The Impact Statement must:

- describe the Aboriginal and treaty rights (e.g., JBNQA) of Indigenous Peoples potentially affected by the Project, including historical context, their scope and the importance of the rights to the rights-bearing groups (e.g., practices, customs, beliefs, worldviews and livelihoods);
- document the values or concerns identified by the groups, as well as any thresholds which, if exceeded, could adversely affect their ability to exercise their rights in a meaningful way; and



- document the cumulative impacts that already impede or could impede the ability to exercise rights or transmit Indigenous cultures and cultural practices.

Indigenous groups must be involved in the baseline characterization of their rights.

5.5.2 Impacts on the rights and values of Indigenous Peoples

The proponent must share studies and information about the Project and its potential impacts with Indigenous groups prior to assessing the impact of the Project on their rights, and collaborate with Indigenous groups in assessing impacts on those rights.

The proponent, in collaboration with Indigenous groups, must document the potential impacts on Indigenous Peoples' rights, including the severity of the impacts the Project could have, as expressed by the Indigenous Peoples potentially affected. To do so, the proponent must take into account the following elements, where relevant:

- residual impacts on Indigenous Peoples' rights and cumulative impacts;
- the Project's effects on Indigenous cultures, traditions, laws and governance;
- the Project's impacts on planning, management or stewardship of traditional lands and resources by Indigenous groups;
- how the Project will change the ability of Indigenous groups to derive future economic benefits from, or maintain an ongoing relationship with, the land or water;
- how the Project aligns with the values, political direction and objectives of Indigenous groups in the fight against climate change;
- how the Project and its impacts weaken or strengthen the authority of Indigenous groups on their territory; and
- how the Project affects any other significant components identified by Indigenous groups.

In the territory covered by the agreement, the Cree and Inuit signatories to the JBNQA enjoy certain rights. For example, Chapter 24 of the JBNQA establishes a unique regime for hunting, fishing, and trapping and recognizes certain rights related to these traditional activities. In developing the impact statement, the proponent is encouraged to consider these rights without being limited to them.

When preparing the impact statement, the proponent is encouraged to consider the values of Indigenous groups without limiting themselves to these values. For reference, the guiding principles of Chapter 22 of the JBNQA, section 22.2.4, and the [Cree Nation Mining Policy](#) provide food for thought regarding Cree values in the context of development projects. In addition, the protection of the traditional way of life, access to healthy land and wildlife resources, and the concept of "living well" of the natural environment are values of importance to the signatories of the JBNQA.

The Impact Statement must:

- describe solutions to concerns raised about impacts on the exercise of rights, as agreed to by Indigenous groups;



- describe the methodology used and agreed to by Indigenous groups for assessing impacts on their rights, and include any Indigenous-led studies that were provided if permission has been obtained from the Indigenous group to do so; and
- provide an explanation where an Indigenous group has not provided its views on the impact of the Project on their rights to the proponent, or where the proponent and an Indigenous group, in consultation with IAAC, agree that the Indigenous group will provide information on impacts on their rights directly to IAAC.



6 Contributions to inform decision making

At the decision-making phase of the IAA, should the decision maker determine that the adverse federal effects that are likely to be caused by the project are likely to be, to some extent, significant, the decision maker will decide whether they are justified in the public interest in light of the extent to which they are significant and of the factors set out in section 63 of the IAA. The requirements in this section of the Guidelines may inform the analysis of these factors.

6.1 Canada's environmental obligations and climate change commitments

The committee, with the support of federal authorities, will analyze the Project's likely effects in the context of Canada's environmental obligations that apply to the Project, and will analyze the Project's greenhouse gas (GHG) emissions in the context of Canada's emissions targets and forecasts. The information gathered during the planning phase, including information regarding the effects of similar development projects, suggests that the project's effects would not contribute to the Government of Canada's ability to meet its environmental obligations and climate change commitments. This is due to the Project's footprint on the receiving environment (e.g., habitat loss resulting in adverse effects on biodiversity, Lake 01 diversion) and potential emissions caused by the Project (e.g., GHG emissions). If the proponent is of the view that the Project's likely effects may contribute to the Government of Canada's ability to meet its environmental obligations and/or climate change commitments, the proponent is encouraged to substantiate this view by describing these likely effects and the extent of their contribution (e.g., net positive impacts on biodiversity through habitat recovery, net negative GHG emissions through carbon capture)

6.1.1 Environmental obligations

Federal environmental obligations relevant to this Project include:

- Canada's 2030 Nature Strategy and legislation that supports the implementation of Canada's biodiversity commitments, including SARA and the *Canada Wildlife Act* (1985), as well as related policies and guidance documents;
- SARA recovery strategies and action plans for all species at risk potentially affected by the Project;
- the Convention on Wetlands of International Importance, especially as Waterfowl Habitat (Ramsar), as implemented in part under the Federal Policy on Wetland Conservation and related guidance documents such as the North American Waterfowl Management Plan; and
- the Convention for the Protection of Migratory Birds in the United States and Canada, as implemented in part by the *Migratory Birds Convention Act, 1994*, and supporting guidance documents on conservation objectives derived from bird conservation regions and strategies.



The Impact Statement must provide a list of SARA Schedule 1 species likely to occur in the study areas and identify the Project's likely effects on these species and their critical habitat as well as the measures that will be taken to avoid or mitigate those effects and monitor them. The Impact Statement must refer to the descriptions of effects already provided for VCs in other parts of the Impact Statement, as appropriate. The proponent is also encouraged to refer to the most recent COSEWIC annual report, and to include other species assessed by COSEWIC as extirpated, endangered, threatened or of special concern.

Where the proponent is of the view that the Project's likely effects contribute to the Government of Canada's ability to meet its environmental obligations, the proponent is encouraged to:

- describe the plans and commitments that contribute to the environmental obligations listed above; and
- with respect to biodiversity²:
 - describe and, where possible, quantify the likely changes to biodiversity resulting from the Project referring to relevant guidance such as the [Voluntary guidelines on biodiversity-inclusive impact assessment](#) from the Convention on Biological Diversity;
 - describe whether and how, by applying the mitigation hierarchy, the Project would result in no net loss or net positive impacts on biodiversity; and
 - describe whether and how the Project's likely effects will contribute to achieving the goals set out in Canada's 2030 Nature Strategy.

6.1.2 Climate change commitments

Where the proponent is of the view that the Project's likely effects contribute to Canada's climate change commitments, the proponent is encouraged to describe its plans and commitments accordingly. If the proponent is of the view that the Project's likely effects contribute to Canada's climate change commitments, the proponent is encouraged to assess the Project's GHG emissions following the [Strategic Assessment of Climate Change](#) (SACC) developed by ECCC, including the draft [Technical Guide on quantification of net GHG emissions, impact on carbon sinks, mitigation measures, net-zero plan and upstream GHG assessment](#). The committee invites the proponent to keep apprised of updates to the SACC and related technical guides published by ECCC. The proponent can also refer to the COMEV directive, more specifically to section 3.9 *Émissions de GES, lutte contre les changements climatiques et adaptation* (French only). The proponent should consider the strategies in place and the efforts made by local, regional and national actors to fight climate change in the Eeyou Istchee region.

² The Convention on Biological Diversity defines biological diversity, or biodiversity, as “the variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part; this includes diversity within species, between species and of ecosystems”.



6.2 The Project's contribution to sustainability

Sustainability is the ability to protect the environment, contribute to the social and economic well-being of the of Canada's population and preserve their health in a manner that benefits present and future generations. The information contained throughout these Guidelines can be used to support the sustainability analysis.

6.2.1 Social and economic well-being of communities

The proponent is encouraged to refer to the requirements of the COMEV directive in sections 4.2.2 *Milieu social* and 5.1.2 *Milieu social* (French only). These requirements cover, among other things, local and regional economy and land use. In addition to the information required in these sections of the COMEV directive, the proponent is encouraged to include in their impact statement a description of:

- workforce and economic development opportunities informed by local and regional economic activities and workforce capacity, including the anticipated region of origin of the workforce (i.e., local, regional, out-of-province, or international employees); and
- economic benefits to Canadians, including Gross Domestic Product growth, tax revenue, as well as indirect benefits such as investments in the development and adoption of clean technologies and the growth of innovative Canadian businesses, clusters, and supply chains (e.g., by providing the critical minerals necessary for the global transition to a net-zero economy).

6.2.2 Extent to which the Project's likely effects contribute to sustainability

The Impact Statement must provide an analysis of the extent to which the positive effects and the adverse federal effects likely to result from the Project contribute to sustainability, according to the following steps:

- identify the key VCs from section 1.2 Selection of Valued Components, as well as any other VCs relevant to the well-being of Canadians and local communities (e.g., economic and social benefits), in order to include them in the sustainability analysis;
- establish temporal boundaries, considering how effects on the identified VCs could affect future generations, including beyond the Project's life cycle; and
- apply the following sustainability principles to determine whether and the extent to which the Project's likely positive effects and adverse federal effects result in a net positive contribution to sustainability (based on the criteria of no contribution, to low, moderate or high contribution):
 - consider the interconnectedness and interdependence of human-ecological systems;
 - consider the well-being of present and future generations;
 - consider positive effects and reduce the adverse federal effects of the designated Project; and



- apply the precautionary principle, and consider the uncertainty and the risk of irreversible harm.