

Federal Authority Advice Record (FAAR)**FAAR Response must be submitted by July 3, 2026**

15-Mile Processing Hub Project – 15-Mile Minerals and Renewables.

Registry File: 90533

Department/Agency	Women and Gender Equality Canada
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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,

- 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 Required**
 - Describe any associated Indigenous or public consultation, including timelines. – **N/A**
 - 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. – **N/A**
 - Identify any associated project-specific guidance or issues of which the proponent should be aware, or information the proponent should provide. – **N/A**
 - Indicate whether your department or agency has identified any power that it will not be exercising or may not be able to exercise to allow the project to be carried out, in whole or in part. – **N/A**
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:
- Specify the key issue (e.g., specific species and location)
 - Specify the project component or activity linked to the key issue
 - Explain why it's a key issue based on:
 - biophysical effect pathway(s) from the specific project component or activity
 - concern unique to the project or a priority within your mandate
 - the issue being material² to decision making under the *Impact Assessment Act*
 - Identify how the issue could be resolved, including through means other than an impact assessment
 - 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 CanadaName and title of Departmental /
Agency ResponderJune 26, 2026

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.

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	b) 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
<i>Identify comments by organization and comment number.</i> e.g.: IAAC-01	<i>Specify the key issue (e.g., specific species and location).</i>	<i>Identify the project component or activity linked to the key issue.</i> <i>Be specific about the nature, scale, novelty and complexity or the component or activity.</i>	<i>Identify the specific biophysical effect pathway between the project component or activity and the affected environmental or human receptor (including Indigenous Peoples).</i>	<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> <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>	<i>Describe why the key issue is material to decision-making as either:</i> - an adverse effect within federal jurisdiction, or a direct or incidental adverse effect, that may be significant based on available evidence including: - federal experts' knowledge and experience with past project assessments; - presence of sensitive species, habitats or human receptors (including Indigenous Peoples); - novel or complex project activities, components or technologies; - high uncertainties in effects or in the effectiveness of mitigation measures; - unknown or unproven mitigation; or - 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>Describe how the key issue could be resolved or addressed by:</i> - Any means, including powers, duties, functions, frameworks, policies or guidance that your department or agency has; - Any means, including powers, duties, functions, frameworks, policies or guidance from another jurisdiction, including the province; - Common, proven, well-understood or standard mitigation measures to mitigate the effect or effect pathway(s); or - Commitments made by the proponent (e.g., in the Initial Project Description).	<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> <i>Consider whether information, studies, analyses or collaborative work with other authorities would be required to address the issue beyond existing means.</i>
WAGE-01	Inclusion of socio-economic, health, and related disaggregated data of Indigenous Nations	3.7 Socio-economic Setting	N/A	Social and economic conditions and disaggregated data related to Indigenous population.	The key issue is material to decision-making as a direct or incidental adverse effect that may be significant, because Section 3.7 Socio-economic Setting (pgs. 100-102) provides limited information on the Mi'kmaq of Nova Scotia who will be impacted by the Project. While Tables 3.7-1, 3.7-2, 3.7-3, and 3.7-4 provide some basic population information, the data provided aren't disaggregated fully. The current baseline study lacks the following information: age groups, mobility, income/socioeconomic	Consider adopting the following approach to establish an accurate baseline for the communities affected and/or identified through the application of Gender-based Analysis Plus (GBA Plus): Examine and include more information from the Indigenous Population Profiles from the 2021 census, which are publicly available on the Statistics Canada website. Data should be analyzed to examine the Project's impact on specific subgroups and	Profile table: Confederacy of Mainland Mi'kmaq [First Nation or Indian band or Tribal Council area], Nova Scotia, Indigenous Population Profile, 2021 Census of Population What is GBA Plus? "Gender-based Analysis Plus (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

					status, household composition, employment sector/skills, to name a few. Disaggregated data is essential to ensure that substantial baseline study has been conducted to assess and monitor potential impacts of the Project on local Indigenous populations. Given that there is a strong Mi'kmaq interest in employment opportunities, and the Project anticipates "to generate meaningful socio-economic benefits, including employment opportunities in rural and Indigenous communities" (pg.143), it is important to ensure that disaggregated data is collected and analyzed in a way that can meaningfully track the extent to which local Mi'kmaq individuals are accessing and benefiting from these employment opportunities, and to identify and address any barriers that may limit their full participation.	ensure GBA Plus in the planning phase of the Project. • Include qualitative and quantitative data that presents a detailed socio-economic profile of the community. • Disaggregate data by gender, sex, age, ethnicity, Indigenous identity, ability and any other community-relevant identity factors, if possible and as appropriate. • Draw from demographic profiles, community studies and other available datasets to identify relevant population groups distinguished by characteristics such as gender, age, location, income, occupation, industry, culture, mobility, ability, and family structure. • Identify where data gaps exist or where Indigenous Knowledge or community knowledge is needed to supplement available information. These gaps should be addressed through engagement or targeted research to ensure an understanding of who may be affected and any intersectional identity factors.	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." Gender-based Analysis Plus (GBA Plus) - Canada.ca
WAGE-02	Employment Opportunities	2.1.1 Potential Benefits (pgs. 32-33) 5.3 Potential Impacts to the Mi'kmaq – Health, Social and Economic	N/A	Social and economic conditions related to Indigenous population	The key issue is material to decision making as a direct or incidental adverse effect that may be significant, because the IPD does not discuss detailed plans to hire from the local community during the construction and operation phases of the project. The Executive Summary (pg. 3) states that "an estimated 1,600 jobs during construction and 950 during operations" will result from the Project, with an estimated 1,380 local jobs created in Nova Scotia during construction, with 740 jobs local to the province during operations (also reiterated in 2.1.1 Potential Benefits, pgs. 32-33). However, the IPD does not provide detailed information on the number or percentage of the workforce that will be hired from the local Indigenous communities to ensure maximization of meaningful local employment at the project site, which was a priority identified during local Indigenous engagement.	In addition to the preliminary pathways of potential effects and proposed mitigation measures outlined in Section 5.3, Potential Impacts to the Mi'kmaq – Health, Social, and Economic, the following information should be considered to support baseline development and promote equitable employment opportunities for the local Indigenous communities: • Has community input been used to develop targeted hiring and skills training goals for underrepresented groups (e.g., Indigenous women, Indigenous youth) to work across a range of positions and seniority levels? • How will the Project commit to hiring local and Indigenous contractors or how workplace policies and programs for local and Indigenous employment (and employment of other underrepresented groups)? Where possible, include projected numbers of total employees from within and outside (e.g., provincial, national, international) the spatial boundaries of the project. • Assess whether there are limited employment or educational opportunities among certain of the	• As per the Tailored Impact Statement Guidelines 5.3.2 (Revised August 2025 [interim version]), the Impact Statement must describe the effects of the project on the health, social and economic conditions of impacted Indigenous groups, including differential effects among diverse population groups from the GBA plus perspective. • Below is an example of a Project who has undergone an IA review and to demonstrate how GBA application has led to positive outcomes, related to employment opportunities and GBV mitigation measures, for the Project and impacted communities and population groups. ◦ Cedar LNG: Socioeconomic Report (July 2025) ◦ Cedar LNG: Socioeconomic Management Plan (July 2024) ◦ Cedar LNG: Gender, Equity, and Diversity (May 2024) ◦ Cedar LNG: Community Feedback Process (July 2024)

						population groups, or if there are historical or contextual issues that have limited certain groups' access to opportunities (e.g., links between access to education and childcare in remote communities). Statistics (qualitative and qualitative data) should be situated within the broader community context to be meaningful. • Explore options to increase Indigenous women's representation in the workforce at all levels on resource development projects, including through accessible skills development training. • Implement employment-equity hiring plans and report on progress on the implementation of these plans. • Accessible employment applications. • Workplace policies and programs for Indigenous employment and employment of diverse population groups, codes of conduct, workplace safety, and cultural training.	
WAGE-03	Mitigation measures for potential gender-based violence (GBV) risks related to the Project	2. Project Information 3.7 Socio-economic Conditions 5.3 Potential Impacts to the Mi'kmaq – Health, Social and Economic	N/A	Inclusion of mitigation measures for gender-based violence (GBV) risks	The key issue is material to decision-making as a direct or incidental adverse effect that may be significant, because the IPD does not discuss mitigation measures to prevent GBV risks on the Project site. The Project involves large-scale workforce demands (1,600 construction jobs; 950 operations jobs) that spans three mines across that are 85 km to 145 km northeast of Halifax, Nova Scotia (pg. 13). However, Section 2 Project Information provides no analysis of workforce sourcing or movement patterns. Although the Proponent suggests local communities are within commuting distance and therefore no accommodations are needed, there is no confirmation that the workforce can be fully or mostly sourced locally (see comments WAGE-01 and WAGE-02). The project scale and geography also amplify potential GBV risks for Indigenous women and girls. The Project spans multiple sites across a large rural region, creating dispersed and potentially isolated work areas, with multiple nearby Indigenous communities with varying levels of services and capacity. Despite the evident GBV risks that are amplified by multiple factors (i.e. large project	Given the potential for transient workers during construction and operations, uncertainty around workforce sourcing, and the Project's proximity to First Nations reserves, WAGE recommends that the Proponent develop clear, proactive, and GBA Plus-informed GBV mitigation measures early in the Project lifecycle, rather than relying solely on a general commitment to IAAC standard mitigation measures. While the IAAC standard measures provide a useful baseline, they are not sufficient on their own to address project-specific risks, particularly those arising from workforce dynamics and worker–community interactions associated with this Project. WAGE strongly suggests that the Proponent establish defined and enforceable policies and measures, including Codes of Ethics, Respectful Workplace, and Drug and Alcohol Policies, supported by robust cross-cultural awareness and workplace training, clear behavioural expectations, and meaningful consequences for violations. These measures should extend beyond the workplace to consider community-facing risks. WAGE further emphasizes the need for ongoing monitoring and evaluation frameworks to assess whether mitigation measures are effective for nearby	The report “Responding to the calls for justice” provided the following recommendations to protect the safety and security of Indigenous women and girls: • implementing measures such as specific consultation with community leaders with knowledge of on-the-ground reality for vulnerable women • local safety initiatives • substance use policies • recruitment and training • incident tracking and monitoring What is Gender-based Violence? Responding to the Calls for Justice: Addressing Violence Against Indigenous Women and Girls in the Context of Resource Development Projects – recommendation 11: training for workers 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. Gender based violence is a public health issue: using a health systems approach (WHO)

					area, multiple Indigenous communities with limited access to services, the correlation between resource extraction projects and GBV), Section 5.3 Potential Impacts to the Mi'kmaq – Health, Social and Economic does not provide targeted mitigation measures that are tailored to the workforce dynamics and local community vulnerabilities. It is important that the Project considers preventive measures that will reduce the GBV risks and make the Project site safe for Indigenous women+ (the term used in the IPD) who wish to seek employment from the Project and reside close to the Projet site areas.	Indigenous communities and to enable adaptive management over time. In addition, WAGE strongly suggests that the Proponent undertake a baseline assessment of existing local GBV-related supports, services, and community capacity, and integrate this study/analysis into Section 3.7 Socio-economic Setting to ensure that mitigation measures are locally appropriate, culturally responsive, and capable of addressing identified service gaps.	Human Trafficking Corridors in Canada. Sex trafficking identified by service providers, Mining camps, see pg. 18. Where are victims/survivors coming from?, see pg. 21. The Geography of Human Trafficking Corridors and Circuits, see pg. 28. Halifax, Nova Scotia – Moncton, New Brunswick, see pg. 33.
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Please insert additional rows as necessary.