

Recommendation: TOR Section 8.5

The Joint Review Panel needs to independently determine significance. They need to review and analyze the assumptions and criteria the EIS uses. They need to do an independent analysis to identify whether or not different definitions and methodology would reach the same or different conclusions about significance as the EIS.

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Recommendation: TOR Section 9.5

The proponent needs to identify specific commitments to provide jobs and contracts to northern residents in legally binding agreements. This includes targets for Aboriginal/non-Aboriginal people and women/men.

Recommendation: TOR Section 9.5

The proponent needs to make credible assumptions and outline possible scenarios for the amount of corporate taxes paid and identify what levels of government will receive what amounts.

Recommendation: TOR Section 9.5

The Joint Review Panel, the proponent, and various orders of government need to identify total public costs related to the project. The proponent and governments need to negotiate an agreement within an appropriate time period to ensure the proponent pays their fair share for all project-related costs.

The Joint Review Panel, the proponent, and various orders of government need to clearly identify a fee for service for any public services the project uses during construction and operations and how and when the proponent pays the fees. This includes fees for things such as recreation facilities, as well as things such as forest fire services. The fee structure should include a reasonable amount for capital and ongoing maintenance.

Recommendation: TOR Section 9.5

The proponent needs to identify up front the specific monitoring protocols they plan to use, including timing. Protocols should show clear links between monitoring, results found, and immediate procedures to remedy any problems.

The EIS seems to imply self-monitoring. The proponent and the Joint Review Panel need to identify the role of independent monitoring, to provide more effective results and greater comfort and confidence for workers and the public.

Recommendation: TOR Section 9.5

We recommend the proponent and the Joint Review Panel apply GPI accounts to the MGP. For example, GPI analysis would consider environmental and social costs, as well as 'lowest capital cost and cost risk'. GPI analysis would consider the costs of things such as increased GHG emissions, habitat loss, labour force disruption, increased family violence, or reduced capacity of community groups. GPI accounts will help everyone understand the true impacts of this project.

See references from the Parkland and Pembina Institutes for more information about GPI.

Recommendations: TOR Section 9.9

The proponent needs to identify how the project helps the NWT become more energy self-sufficient in the long term. For example, what specific commitments will the proponent make about how, when, and at what price Mackenzie Valley communities have access to natural gas.

The Joint Review Panel needs to do an independent analysis of the amount of fossil fuel energy the MGP will consume and compare this to the amount of fossil fuel energy it will produce. This analysis relates directly to the need for the project. For example:

- ✓ The amount of fossil fuels it takes to produce materials, such as steel pipe, for the project.
- ✓ The amount of fossil fuels it takes to transport people and materials for the project.
- ✓ The amount of fossil fuels it takes to service work camps.

- ✓ The amount of fossil fuels it takes to operate heavy equipment to construct the pipeline.
- ✓ The amount of fossil fuels it takes to carry out exploration to support the pipeline, including rights-of-way and seismic lines.

The Joint Review Panel needs clear information about the relationship between the need for the project and the end use of the natural gas.

Recommendation: TOR Section 10

The proponent needs to do a proper technical gender-based analysis of social and economic impacts from the Mackenzie Gas Project before public hearings.

Recommendation: TOR Section 10

The proponent needs to immediately develop and implement a plain language policy related to any and all public communications.

Recommendation: TOR Section 11.5.3 and 15.2

The proponent needs to identify project impacts on the cost of living of land-based production activities of the mixed economy.

The proponent needs to identify project impacts on the mixed economy itself. Will the mixed economy continue to thrive?

The proponent needs to develop mitigation measures that recognize the mixed economy as described above and in the reference. Mitigation measures need to respond to the needs and rhythms of the mixed economy. For example, northern workers need training and employment schedules that **truly** accommodate their responsibilities at home. Unions and other workers need to understand how and why these mitigation measures contribute to peoples' material, as well as social and cultural, well-being.

Recommendations: TOR Sections 11.5.3 and 15.2

The proponent needs to provide information that clearly identifies the relationship between education levels and work experience of people in the 'want a job' category and education levels and work experience needed for direct construction jobs.

The proponent needs to clearly show how many direct construction jobs northerners might get without any upgrading and/or training.

The proponent and contractors need to develop a pay schedule spread over a longer time than the work cycle. For example, a person who works for four months has the option to receive their pay over six months. This should be entirely voluntary. Other employers that offer different pay options can provide examples of how to best administer this.

Recommendation: TOR Sections 11.5.3 and 15.2

The proponent needs to identify mitigating measures to ensure business, government, and the voluntary sector can maintain their human and financial capacity to deliver needed goods and services to communities. Mitigating measure need to recognize the specific needs of each sector. The proponent needs to outline their roles and responsibilities in terms of these mitigating measures.

The proponent needs to consider some kind of compensation for lost productivity, recruitment, and other costs related to reduced capacity to deliver needed goods and services to communities.

Recommendation: TOR Section 11.5.3 and 15.2

The proponent needs to identify gender-based strategies to:

- ✓ Ensure women have equal opportunity for jobs and training.
- ✓ Encourage women to participate in trades and technology jobs, and to help reduce gender discrimination.
- ✓ Make sure workplace policing and security meet women's needs.

The proponent needs to provide details about their anti-harassment policy, including how they plan to monitor and enforce it. The proponent needs to provide details about the anti-harassment and gender sensitivity training they plan to provide at work camps. They need to demonstrate how they will structure work camp accommodations and schedules to meet the specific needs of women.

Recommendation: TOR Sections 11.5.3 and 15.2

The proponent needs to develop and implement compensation schemes.

Recommendation: Section 11.5.4 and 15.3

The proponent should use ranges of income plus median income, instead of or as well as averages, to show growth in gaps between top and bottom ends. The proponent should determine if there is a pattern to in-territory migration based on income levels.

Recommendations: TOR Sections 11.5.4 and 15.3

The proponent needs to identify specific targets for training northerners, including Aboriginal/non-Aboriginal and men/women.

The proponent needs to identify what guarantees they offer for construction and operations jobs for people who successfully complete training.

The proponent needs to identify an adjusted timeline for project construction so that a maximum number of northerners can be trained to benefit from construction jobs.

The proponent needs to identify mitigation measures to deal with lack of work experience as a barrier to northerners getting a job, possibly through a mechanism involving mentoring.

Recommendation: TOR Sections 11.5.8 and 15.5

The proponent needs to identify and use a consistent definition of wellness. The definition should be holistic and be guided by how communities and regions define wellness. Measures of wellness need to consider the broader social context and factors that contribute to wellness.

Recommendation: TOR Sections 11.5.8 and 15.5

The proponent needs to adequately consider the following indicators, in addition to the indicators in the EIS, and develop a more holistic analysis of wellness. A more holistic analysis of wellness may include other indicators as well as those listed here.

- ✓ **Social capital.** The proponent needs to identify the impacts of the project on the social capital that communities and regions have to help keep them vital and flourishing. Social capital includes things such as volunteer or community groups, recreation facilities, daycare or family literacy

programs, cultural activities, shelters for women and children, etc.

- ✓ **Economic and social community dynamics.** The proponent needs to identify the impacts of the project on economic and social community dynamics. For example relationships among things such as meaningful job training, good social supports, community policing, good recreation opportunities, proper and affordable housing, etc. Will the project build on community strengths? What impacts will rotational work cycles have on families and communities? Will people have less time or inclination, even though they may have more money, to participate in traditional harvesting activities? How does this affect economic and social dynamics in the community?

- ✓ **Alcohol as a symptom.** Alcohol contributes to and is a factor in many social problems, but it is not the 'root cause' as the EIS states. There is not a direct 'cause and effect' relationship between alcohol and social problems. Alcohol doesn't 'cause' family violence.

The EIS suggests liquor restrictions and control as two main mitigating measures to reduce alcohol abuse. These include local bylaws to restrict liquor and strict enforcement of the Liquor Act. We question what research and experience show these measures are the 'most effective measures'.

The proponent needs to identify project impacts on alcohol as a symptom. What mitigating measures could most effectively deal with alcohol as a symptom?

- ✓ **Infectious diseases.** During consultations in the Sahtu and Deh Cho people were concerned about workers bringing in infectious or contagious diseases. Mitigation measures in Section 5.3.4 don't seem to take this issue seriously.

The EIS identifies an increase in the rate of infectious diseases as a possible impact of the MGP. The EIS notes that every construction camp

'will be staffed by individuals who are able to deal with most health conditions'.

The GNWT's response to Information Request NWTLC R2-25 states '... the GNWT expects the proponents to provide capacity within camps to diagnose, report, and manage infectious diseases.' The proponent's response to the same IR states 'In cases where ... the affected party will be transported to a local clinic.'

Infectious diseases pose a particular risk to remote, crowded camps with temporary living facilities. Camp staff may also have to deal with sexually transmitted infections. Camps will have limited laboratory facilities. Without lab facilities, how can they decide if something is serious enough to send someone out?

The proponent and the GNWT need to clearly identify the financial and human resource impacts of the project.

The proponent needs to identify specific policies and procedures for camp health staff to test for and deal with infectious diseases and sexually transmitted infections. The proponent needs to develop specific policies and procedures to contain the spread of infectious diseases.

The proponent needs to clearly indicate what role and responsibilities they expect different levels of government to play to prevent, identify, and contain infectious diseases. What specific information, training, and assistance will the proponent give workers to help prevent the spread of infectious diseases and sexually transmitted infections within the camps and to the wider community?

- ✓ **Critical incident response and critical incident stress debriefing** for people such as nurses and other health personnel, firefighters, and police or security officers may be needed. The EIS does not mention this issue. The proponent needs to identify specific policies and procedures for this issue.
- ✓ **Drug use and abuse.** The EIS and responses to our Information Request provide little specific information about project impacts on drug use and abuse. This could be a

serious problem. The proponent needs to identify project impacts on drug use and abuse, including possible mitigating measures and residual impacts.

- ✓ **Mental and emotional disorders.** The EIS has no clear definition of mental and emotional disorders and the different resources we need to deal with them. The proponent needs to clearly define resources needed respond to things such as schizophrenia, bipolar disorder, dissociative disorders, and suicide. They also need to identify different resources needed to deal with personal, marital, and family stress; family violence; sexual abuse; addictions; and mild to moderate forms of depression. The EIS tends to rely on physical ailments and ‘physician treatments of mental disorders’.

The EIS cites information from the Inuit Tapariit Kanatami that ‘current responses to mental wellness among Inuit are not working’. It then lists several problems and concludes that there is a ‘need for a more effective mitigation approach’. But it isn’t clear how the proponent proposes to address this issue and what role the proponent or the territorial or federal governments have.

- ✓ **Racism and sexism.** Racism and sexism have potential to be significant issues in the oil and gas industry. The proponent needs to consider the impacts of the project on these issues, and the relationship between these issues, mitigating measures, and individual, family, and community wellness.
- ✓ **‘Out-of-wedlock’ births.** The EIS suggests there may be some increase in these births and ‘such births will have only a marginal effect on birth rates and the female work force’. The proponent’s response to Information Request NWTLC R2-15 states ‘Project construction might result in an increase in unwed mothers, but by a relatively small number, because project construction will last for only three years.’ This is a narrow view of the impact of ‘our-of-wedlock’ births. This impact doesn’t end just because construction ends – in three years or four. The proponent needs to consider the short-

and long-term impacts of out-of-wedlock births from a social and cultural perspective.

- ✓ **Health services providers.** The EIS recognizes project impacts will increase regional and community needs related to health services providers. Health services staff should include doctors, nurses, addiction counsellors, social workers, and psychologists to effectively deal with the impacts. The proponent needs to accept responsibility to cover any costs connected with increased needs for health and social services.

The proponent will need to hire their own health professionals to work at their camps. The proponent needs to identify the potential impacts of the project on the ability of the GNWT to recruit and retain health professionals, especially in view of projected increased needs.

Recommendation: TOR Section 11.5.8 and 15.5

The proponent needs to help government, business, and the voluntary sectors to put real plans in place to help individuals, families, and communities during the sharp transition from 'boom' to 'bust'.

Recommendations: TOR Section 15.6

The proponent needs to provide trapping income in real dollar figures, adjusted for inflation.

The proponent needs to provide a breakdown of Aboriginal language use by age and gender. They need to analyze the relationship between language use and participation in harvesting activities versus 'wage employment' jobs.

The proponent needs to describe details related to cultural awareness training.

The proponent needs to identify exactly how and how often they will provide country foods. They need to identify what factors prevent them offering country foods every day to those who want them and how they plan to mitigate against those factors.

Recommendations: TOR Section 15.9

The proponent needs to provide a detailed analysis of project impacts on adult education programs, staff, and learners - similar to the analysis they did for high schools. The analysis should include baseline information about what adult education programs each community and region has. It should provide baseline information about adult English literacy skills and the need for different adult education programs. It should measure how the project and associated training affect the capacity of adult education resources to meet those and other adult education needs of people and communities.

These needs may include adult basic education, academic studies, community learning centres, community and family literacy, Aboriginal language programs, access programs, workplace literacy, and job skills training. The analysis should also consider how low literacy levels affect people's health, job opportunities, income level, parenting, and overall participation in community life.

We also recommend the Joint Review Panel, the proponent, and various levels of government discuss a more balanced cost-shared approach to develop a local work force to meet the needs of the oil and gas industry.

Recommendation: TOR Section 15.9

The proponent needs to identify the long-term impacts of project infrastructure and activity on fighting forest fires.

The proponent needs to work with the GNWT and develop specific policies in line with the NWT Forest Fire Management Policy and Forest Fire Prevention and Suppression Guidelines for Industrial Activities.

The GNWT needs to apply the Forest Protection Act and identify fees the proponent must pay when and if the government fights forest fires to protect infrastructure or to protect other assets because of the added risks associated with the presence of oil and gas infrastructure and activity.

Recommendations: TOR Section 15.9

The proponent needs to take some responsibility and provide temporary and/or short-term housing for workers, especially for communities with existing severe housing shortages.

The proponent needs to provide an analysis of project impacts on available housing for people on fixed, poverty-level, and low incomes by community and region. This analysis should include baseline information, project impacts, mitigation measures, and residual impacts.

The proponent needs to provide an inventory of 'abandoned housing' and an analysis of whether or not the amount and condition of this type of housing has potential to meet increased housing needs. The proponent also needs to identify who will decide what housing can be successfully repaired? Who will initiate and provide incentives? The EIS implies the GNWT will provide the initiatives and incentives. Does the GNWT have the human and financial resources to do this?

The Joint Review Panel needs information about costs related to indirect housing needs as part of the total cost of the project.

Recommendations: TOR Section 15.9

The proponent needs to provide emergency response plans up front, within an adequate time line for effective review.

The Joint Review Panel needs to ensure all government agencies potentially involved with emergency response have sufficient time to review the proponent's plans and to identify any gaps and potential costs.

Recommendations: TOR Section 15.9

The proponent needs to identify the schedule for job rotations and their specific plans for how they will move so many people back and forth. The proponent needs to identify how they will assess if a person is a 'northerner' or not. Can the proponent limit hires to northerners in view of mobility rights laws in Canada? Will all contractors and sub-contractors also apply these policies?

The Joint Review Panel needs to compare in-migration figures from the Bureau of Statistics with those in the EIS. What proportion of in-migration predicted by the Bureau of Statistics is due to the MGP? What criteria did the Bureau of Statistics use to determine this proportion? How does this compare with the analysis of in-migration in the EIS? What in-migration figures do we consider reliable or accurate?

Recommendation: TOR Section 15.9

The proponent, different orders of government, and the JRP need to clearly identify what financial, human, and physical resources regions need to cover project-related costs. Do regions have the political capacity to effectively direct and manage these resources?

Timing is also an important question. Government, agencies, regions, and communities need to identify how much time they need to properly plan for ways to minimize economic and social costs. They need time to plan for and put in place the needed infrastructure.

The JRP needs to identify what terms and conditions related to timing and rate of production and development will maximize regional and national benefits and assure a fair return to the public purse.

Recommendation: TOR Section 17

The Joint Review Panel needs to do an independent analysis of cumulative social and economic effects.

Recommendation: TOR Section 22

The proponent needs to develop a plan to provide a certain portion of total project energy needs with alternative energy options. For example renewable energy such as passive and active solar, wind, and hydro; geothermal; and co-generation. The plan could include things such hybrid trucks and buses.

The plan needs to recognize benefits from things such as less noise pollution, less risk of fuel spills, less GHG emissions, and northern gains in renewable energy infrastructure and expertise. The plan needs to account for upfront capital costs and ongoing operating costs, throughout the life of the project. Operating costs should be based on projected prices of fossil fuels through the life of the project.

The GNWT needs to develop and implement a renewable energy portfolio for the Mackenzie Gas Project, to reduce GHG emissions and to develop northern renewable energy infrastructure and expertise.

Recommendation: TOR Section 24

The proponent needs to identify policies to protect and ensure workers' rights, including privacy rights.

The policies must state how searches and tests will comply with federal and territorial human rights laws and equality principles and standards. The policies must state how searches and tests will respect applicable labour standards legislation and workers' rights, including privacy rights.

Recommendation: TOR Section 24

The proponent needs to satisfy the TOR and develop specific plain language policies for things such as workplace health and safety, environmental management and monitoring, emergency response, and worker recruitment, training, and hiring. The proponent needs to identify how contractors and subcontractors will apply these policies.

Recommendation: TOR Section 25

The proponent needs to provide the following monitoring and follow-up details:

- i) Describe any existing socio-economic monitoring programs in the Mackenzie Valley. Describe their potential relationship to proposed monitoring and follow-up initiatives for the MGP.
- ii) Describe how the proponent consulted government and other agencies about socio-economic monitoring and follow-up. Identify a timeline and audience(s) for future discussions.
- iii) Identify preliminary socio-economic indicators the project should monitor. Identify the costs to gather and analyze the data. Identify what costs and how much the proponent is prepared to cover.
- iv) Propose details of how to design, implement, and evaluate monitoring programs and management plans. Include roles and responsibilities, and a timeline for the process that relates to key milestones for the overall project.
- v) Describe the role of Traditional Knowledge and community-based monitoring in the overall plan to monitor and manage socio-economic effects of the MGP.

- vi) Identify methods to carry out gender-based analysis to monitor all social and economic effects and any physical environment effects related to human health.
- vii) Develop preliminary management plans for various types of socio-economic effects, and present a draft. Include the following details at a minimum: roles and responsibilities for mitigation measures, measurable targets to gauge success, proposed thresholds for management responses, preliminary costs, and multi-year budgets.
- viii) Suggest or recommend who should review and approve the socio-economic monitoring and follow-up agreements. What orders of government or other agencies should be involved?

Recommendation: TOR Section 25

The proponent, the territorial and federal governments, and other agencies need to identify money and human capacity to gather good information about project impacts on northern people, the environment, social systems, and resources. Communities and regions need to be directly involved in defining and carrying out the research, including traditional knowledge.