



FemNorthNet brief to the Standing Committee on the Status of Women
On Gender Based Analysis

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**Requiring Gender Based Analysis Plus (GBA+) in Environmental
Assessments**

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Summary

Research by the Feminist Northern Network (FemNorthNet) over the past six years has revealed just how important it is to include a GBA+ requirement as a mandatory component of Environmental Assessment processes.

Our research shows:

- No requirements for gender based analysis in environmental assessments in most jurisdictions across Canada;*
- Failing to consider the impacts on half if not more of the local population can miss the serious downsides that local women and communities can experience with new resource developments;*
- Connecting federal gender based analysis requirements with environmental assessments can help to identify and therefore mitigate the negative consequences of resource development for women and communities who bear the greatest burden.*

We call on this Standing Committee to seize the opportunity with the current review of the federal environmental assessment legislation to press for the addition of a requirement for gender based analysis+ in environmental assessments. Strengthening and aligning Environmental Assessments and GBA+ – and mandating their use – will support Canada's efforts to advance equitable, sustainable development for diverse populations in the North and South.

Findings to support this conclusion and recommendations to advance this goal are provided below.

¹¹ This brief is based on work by members of FemNorthNet: Deborah Stienstra, Leah Levac, Gail Baikie, Jane Stinson, Barbara Clow and Susan Manning

Introduction

Thank you for your investigation into Gender Based Analysis (GBA) now. The timing provides an excellent opportunity to influence the federal review of the Environmental Assessment Act in order to introduce a requirement for GBA+ in all federal environmental assessments.

Over the past six years the Feminist Northern Network (FemNorthNet) has been conducting participatory action research to investigate the impacts of resource development on diverse local women in a few northern communities in Manitoba (Thompson) and Labrador (Labrador West and Happy Valley-Goose Bay).

A description of the Feminist Northern Network is provided at the end of the brief.

The importance of GBA+ in Environmental Assessments

Despite the significance of resource development and extraction for the Canadian economy and society, regulatory mechanisms fail to address the significant impacts of 'development' on a majority of Canadians, and continue to perpetuate disproportionate negative impacts on many marginalized groups.

Our research, particularly concerning the impacts of the new hydro-electric dam at Muskrat Falls, Labrador on the Lower Churchill River, reveals just how important Environmental Assessment (EA) processes can be when they go beyond the environment, narrowly defined, and call attention to the potential negative impacts on women and communities. Our experience and research revealed why it is important to link Gender Based Analysis plus with Environmental Assessments.

What is GBA+? Why is it important?

We use the term GBA+ because it is important for the analytical framework to go beyond one-dimensional gender analysis which views women's experiences as universal and does not distinguish between different groups of women. Using GBA+ indicates an intersectional analysis here. One that recognizes that women's experiences vary depending on a complex interaction of identities including race, class, ability, sexuality, language and more that in turn interact with privilege, oppression and inequality. It is therefore important to look for and identify the differential impacts on different groups of women, to really understand what's happening.

Applying GBA+ to Environmental Assessments of resource developments also means looking at impacts on women's families and communities, since women tend to be very connected to and affected by both.

FemNorthNet's intersectional analysis revealed that the costs and benefits of resource development are not evenly distributed across populations or communities. Women and other marginalized populations, including Indigenous

people, people with disabilities, seniors, and recent immigrants, disproportionately experience these and other negative effects of resource development. The gender and intersectional effects of resource development are often invisible in research, policy development, program implementation, monitoring and evaluation.

Currently federal and most provincial and territorial Environmental Assessment panels are not required to consider gender impacts or impacts on communities. (See Appendix 1)

GBA+ analysis should be mandatory in Environmental Assessments in order to identify and mitigate negative impacts of resource development on diverse women.

When EAs ignore gender and diversity, the voices of women – who constitute more than half of the population – and other marginalized groups are silenced. For example, during the early stages of environmental assessment for the Muskrat Falls-Maritime Link Hydro-electric Project, women’s community groups in Labrador were not consulted. FemNorthNet worked with local women to highlight many of the social, cultural, and community harms associated with resource development – information that might not have come to light through the Environmental Assessment otherwise. When EAs ignore gender and diversity it is also difficult to expect developers, other groups in the community, and government to plan for, monitor, and mitigate harms for diverse populations of women and men.

As a result of FemNorthNet’s support for diverse local women to raise their concerns about the anticipated local impacts from building the new mega-dam nearby, the Panel made a series of important recommendations to mitigate the negative consequences the women identified, especially on their community. Unfortunately, the lack of action to implement the panel’s recommendations on the community reveals another flaw in the EA process that also needs to be addressed.

Why is GBA+ Essential for Environmental Assessments?

Our research, which also involved a comprehensive literature review, provides compelling evidence that the **negative effects of resource development are experienced most often and profoundly by women, Indigenous people, people living in poverty, people with disabilities, and other marginalized groups.** We found that new resource developments and extraction activities contribute to significant adverse effects on northern and remote communities, including:

- Disproportionately negative effects on local women, Indigenous people, people with disabilities, seniors and recent immigrants;
- High housing costs, lack of housing and increased homelessness;
- Greater strain on existing infrastructure, such as hospitals and other health and social services;
- Few jobs and job opportunities for local, unskilled workers;

- Higher rates of food insecurity as a result of rising food costs and loss of traditional, land-based food sources;
- An increase in gender-based violence, sex work, and human trafficking;
- Loss of access to the land with negative effects for subsistence, continuity of culture, and well-being.

How might GBA+ be integrated into Environmental Assessments?

Many tools have been developed to integrate GBA+ into the work of federal departments and agencies, such as Status of Women Canada's on-line GBA training resource for federal policy makers, which is publicly available. More work could be done to develop and tailor this to Environmental Assessments and federal departments advancing resource development generally.

FemNorthNet also designed a specific tool for applying gender and diversity analysis to resource development.² It poses a series of questions to be considered during all phase of resource development, including:

1. What are the costs and benefits, broadly defined, of the project and for whom? Will communities benefit socially and culturally as well as economically?
2. Whose needs are being considered and/or addressed? Is the project development process inclusive of diverse populations of women and men?
3. What kinds of information are being gathered and how is the information being used?
4. Who has power to make decisions and how are decisions made?
5. Who is responsible for on-going monitoring and reporting upon projects? What plans are in place to mitigate harms that emerge before, during, and after development?
6. Is social justice a consideration in development, implementation, monitoring?

Where to from here?

Recently, both GBA and EA have come under scrutiny. In 2015, for example, the **Auditor General of Canada observed** that many federal departments and agencies were not using GBA or not using it well, completely, and consistently, concluding that **“when gender-based analysis is missing or incomplete, gender-specific impacts might not be fully factored into government decisions about policy, legislative and program initiatives”**. At the same time, the federal government recognized that EAs, required for most large resource development projects, needed to address the effects of development on people as well as on land and wildlife.

² FemNorthNet. Feminist Intersectional Policy Analysis: Resource Development and Extraction Framework. CRIAW: Ottawa. 2014. <http://fnn.criaw-icref.ca/images/userfiles/files/FIPAFramework.pdf>

In 2016, the federal government responded to these findings, increasing funding for GBA in the federal budget and introducing new, interim EA principles that affirm the importance of consulting with and considering the implications of resource development for communities, with particular attention to Indigenous rights. These are encouraging developments. With new investments in GBA and a broader understanding of EA, these complementary policy mechanisms could help to ensure that Canada's resource development is sustainable, equitable, and respectful of diversity.

But the requirement for GBA+ in Environmental Assessments – and in all government policies, programs, and initiatives – should not be optional. Indeed, according to the 2015 Auditor General's report, **one of the principal barriers to the integration of GBA into policy, legislative, and program initiatives was “the absence of mandatory requirements.”**

Recommendations

1. For the Standing Committee on the Status of Women (FEWO) to press the federal government to play a leadership role in integrating GBA+ into its Environmental Assessment processes, encouraging provinces territories to do so as well.
2. That FEWO receive a status report on this initiative annually until it is accomplished.
3. That the federal Auditor-General report on extending GBA+ plus to the federal Environmental Assessment Agency and other federal departments and agencies that promote or are involved with new resource development projects (eg/ NRCan, INAC, CanNor...).
4. That Status of Women Canada be provided with a robust mandate and additional resources to assist the Environmental Assessment Agency and other federal departments and agencies that promote or are involved with new resource development projects, with developing and applying a GBA+ framework to their work.

That Status of Women Canada develop complementary community-oriented tools for GBA+ to ensure that affected communities can understand and monitor GBA+ measures in their communities

5. That communities be provided sufficient and on-going resources to consult on resource development projects and to identify, monitor and address the impacts on diverse and marginalize members of their communities over time; as such, the federal government should take the lead in working with other levels of government to address these needs so there can be meaningful community engagement in Environmental Assessments.

6. That the federal review of the Environmental Assessment Act also focus on strengthening mechanisms for compliance with EA panel recommendations for GBA+ analysis to monitor and mitigate negative consequences.

Appendix 1: Requirements for Gender Based Analysis and Environmental Assessment by Jurisdiction

	Gender Analysis¹	Environmental Assessment
Canada	GBA required for all federal policies, programs, and proposals submitted to Cabinet, but is not consistently implemented in many federal departments and agencies.	Socio-economic impacts only considered for Aboriginal people and communities. Other social impacts only considered only when project intersects with another federal responsibility.
AB	GBA not required. Currently implementing a GBA Strategic Plan across provincial government.	Considers social, economic and cultural impacts. Proponent is required to develop First Nations Consultation Plan.
BC	GBA not required. Limited application of GBA in relation to women’s health.	Considers economic, social, heritage and health effects. Encourages First Nations consultation.
MB	Individual provincial departments have completed training, and have policies requiring Gender and Diversity Analysis.	Considers socio-economic implications only when the direct result of environmental impact.
NB	GBA mandated by Cabinet and required for all departments, policies and programs.	Considers socio-economic impacts, including effects on community structure, quality of life and valued spaces.
NL	GBA not mandated, but is accepted part of official practices. The Women’s Policy Office is consulted at all stages of policy creation process when there is a potential gendered impact.	Considers social, economic, recreational, cultural and aesthetic implications for communities. GBA+ is only required in relation to employment equity in EA process.
NS	GBA not required. Nova Scotia Advisory Council on the Status of Women works with many government departments to do GBA+.	Considers effects on human health, socio-economic conditions, and physical and cultural heritage.
NWT	GBA not required.	Mackenzie Valley EA process considers a variety of social, cultural, and heritage impacts.

NU	No formal GBA process mandated or practiced.	Effects on Inuit way of life must be considered at all stages of project. Socio-economic impact assessment part of EA process. Encourages proponent consultation with women's groups.
ON	Use of Inclusion Lens to consider diversity in all policies and programs is required.	Considers socio-economic and cultural impacts. Proponent is required to consult with Aboriginal communities.
PEI	Individual departments, committees and councils have Gender and Diversity Analysis policies.	Socio-economic impacts limited to land use.
QC	GBA is used in some departments and programs. Two action plans to increase the use of GBA have been developed.	Northern Québec's processes consider socio-economic and cultural impacts for Aboriginal communities. The Cree and Inuit are part of the review boards for projects in their territories.
SK	GBA not required. The Status of Women office conducts Sex and Gender Based Analysis upon request for government departments.	Only considers socio-economic impacts for Aboriginal communities, and only in relation to traditional land use and treaty rights.
YK	GBA not required. Cabinet submission template asks about differential impacts for women and Women's Directorate reviews Cabinet submissions using GBA lens.	A socio-economic impact assessment is part of EA process. Explicitly values Aboriginal knowledge in EA process.

Source: Steinstra, Levac, Baikie, Stinson, Clow, Manning. Gendered and Intersectional Implications of Energy and Resource Extraction in Resource-Based Communities in Canada's North. Feminist Northern Network. May 2016.

The Feminist Northern Network, FemNorthNet, involved 40 community leaders and activists, over 30 students and 20 academic researchers from northern and southern Canada. FemNorthNet started in 2010 when the Canadian Research Institute for the Advancement of Women (CRIA-W-ICREF) was awarded a Community University Research Alliance (CURA) grant from the Social Sciences and Humanities Research Council. FemNorthNet expanded its funding with grants from many sources since 2010, including a grant from the federal SWC Women's Program for leadership development programs for northern women community leaders.