# Out of the Rhetoric and Into the Reality of Local Women's Lives

Submission to the Environmental Assessment Panel on the Lower Churchill Hydro Development

by
The Mokami Status of Women Council

with FemNorthNet

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#### **Abstract**

This submission is presented by the Mokami Status of Women Council (MSWC) with the support of FemNorthNet to the Environmental Assessment Panel on the Lower Churchill Hydroelectric Development Project. The MSWC is a feminist, equality-seeking organization that has been operating in Happy Valley-Goose Bay since 1979. This paper raises three concerns: i) the local socio-economic impacts of a large-scale development like the Lower Churchill hydroelectric project; ii) inadequacies in NALCOR's current Environmental Impact Assessment and related labour market issues; and iii) recommendations for preventing and/or mitigating the negative social impacts of this development on the women and communities of the Upper Lake Melville region.

#### Introduction

The Mokami Status of Women Council (MSWC) is a small community organization, with two full time staff. Our resources are stretched daily trying to deal with one crisis after another. The reason the MSWC is able to make this submission is because of our connection to FemNorthNet – a national research network funded by the Social Sciences and Humanities Research Council and focused on exploring questions about women in the context of economic restructuring in northern communities. This network exists precisely because women can be adversely affected, and their interests largely ignored, during large scale economic development initiatives. Unfortunately, we fear these issues are being down played or dismissed within the assessment of costs and benefits Lower Churchill project. We welcome the opportunity to provide this submission within the Public Consultation on the development of the Muskrat Falls Hydro-Electric Development project. We hope our intervention will enable recommendations coming from the Panel to address women's issues fully and establish a process through which Happy Valley-Goose Bay experiences sustained economic, social and environmental development, rather than rapid economic growth, social change and sudden decline.

We would like the Panel to also recognize that the MSWC and FemNorthNet speak with and strive to portray the interests of diverse women with multifaceted backgrounds and needs. When we say women, we mean women of all ages, Aboriginal women and women of different racial and ethnic backgrounds, women who are employees, women who are unemployed, women who have disabilities, women who are resident in the Upper Lake Melville region and women who are transient or migrant, women who are sometimes at risk and women who are often at risk. NALCOR appears to have primarily limited its interest in and responsibility to women employed within the industry. Obviously such a varied group of people will be affected in different ways by the proposed development project, and all of these are important. We cannot assume that organizations that claim to represent a particular people or group will represent the views and desires of women within in that group.

## i) Socio-Economic Impacts

The MSWC, through its continuing work with diverse women and their families in the Upper Lake Melville area over the past three decades, has seen the cycle of boom and bust first hand, and has dealt with its repeated and reverberating effects. Through this lengthy experience, and in direct contradiction to the claims of the NALCOR Environmental Assessment, we have identified 5 key priority areas that must be considered as illustrating significant socio-economic impacts from industrial development. These priority areas are: violence against women; poverty; child care; housing; and mental health, substance abuse and addictions. Increasing problems for women and their families are expected to occur within all of these areas as the development entails enhancements to the local economic

infrastructure and leads to an influx of money (for a few), transient male workers, and industrialization without concurrent investment in social infrastructure, and ultimately, also attention to the maintenance and enhancement of social capital, social cohesion and the cultural capital of the community (Temple Newhook, Neis, Jackson, Roseman, Romanov, Vincent; 2011). The findings of the MSWC and FemNorthNet are corroborated by the experiences of other Northern communities in Canada where large-scale development has occurred. These will be referenced throughout our discussion of our key priorities. However, we have not been resourced for, and have not done, a full scale investigation. That was and continues to be NALCOR's responsibility, not ours.

Violence against women, like our other priorities, already exists as a significant problem in this region. The sexual and physical violence we see disproportionately affects Aboriginal women, and women who live in poverty. This violence will increase as it has in other boom towns, such as Fort McMurray where, according to Clarke's 2008 statistics, "the crime rate has soared. Assaults in Fort McMurray are reportedly 89 percent higher than in the rest of Alberta" (qtd. On Tar Sands Watch website <a href="https://www.tarsandswatch.org">www.tarsandswatch.org</a>). Thus, safety issues for all women, domestic and otherwise, should be a central priority for NALCOR and its community partners, including enforcement and justice organizations that have already come under fire in the MSWC's 2007 "Purple Heart Campaign Report" 1.

Just as violence is already a problem in the Upper Lake Melville region, there already exists a housing crisis in Happy Valley-Goose Bay, which can only worsen as thousands of transient workers flock to the region to work on the project. While most workers may be housed in a temporary camp, many others will wish to buy or rent housing in the town. This situation will drive prices of housing and rental accommodations out of reach for many permanent residents who will not be making salaries similar to project workers. According to the 2007 Community Plan commissioned by various social service providers in HV-GB, the situation for the homeless and under-housed was serious and multifaceted. In order to deal with this issue, they found that it would take more than better paying jobs. While jobs would help, the Plan also said that, "it will be necessary to assist people to both get appropriate, affordable housing and to access the tools and services necessary to keep that housing" (23). This is because people (who are from HV-GB, and from coastal communities) who require housing very often have multiple and complex needs that require attention from social service providers like Labrador Grenfell Health, the MSWC or the Labrador Friendship Centre, among others.

Of course, poverty is directly linked to under-housing and homelessness. We do recognize that the better paying jobs offered by the Lower Churchill Project will benefit a portion of the female population who have the required education and training, but most women in the region lack the necessary education and training or have not had apprenticeship opportunities. The women who are employed will ultimately benefit only if gender equity is enforced within the hiring policies of the proponent and its sub-contractors, and only if gender sensitivity training is continuously given throughout the projects many phases. NALCOR and its subcontractors must identify and ensure the appropriate supports are in place including suitable childcare, appropriate accommodations, female supervisors and upper managers, gender sensitivity training and sexual harassment policies. Unfortunately, those residents

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<sup>&</sup>lt;sup>1</sup> In the 2007 "Purple heart Campaign Report", the MSWC conducted first-person research to "monitor violence against women cases in court" (6) in Happy Valley-Goose Bay, and from this research critiqued the Provincial justice system for its delays in processing cases involving violence against women, not providing a safe environment for survivors of violence in courtrooms, and for giving conditional sentences to violent and sexual offenders, among other things.

who are not employed with the project are unlikely to see much of a trickle-down effect. More than likely they, and local businesses, will experience the negative effects of what Polese and Sheamur have dubbed "the Intrusive Rentier Syndrome" wherein people are unwilling or unable to accept lower waged jobs because of their "high wage-cost location" (xxv)². In other words, wage inflation from the Lower Churchill project will only help those who make the highest wages, while those who work for small businesses and social service providers who cannot afford to increase wages will find their cost of living, especially housing costs, too expensive. Keep in mind, as evidenced by the proponent's own statistics that about half the jobs in the low wage service and retail sector in Labrador exist in Happy Valley—Goose Bay. This may also lead to a situation where local businesses bring in international migrant female labour (Temple Newhook et al., 2011). Who is going to ensure the interests of these women are adequately addressed?

Mayor Leo Abbass spoke to the issue of affordable housing in his address to the Joint Panel hearings on March 3<sup>rd</sup>, 2011 ("Transcript", 99). He spoke then about his collaboration with the Labrador Friendship Centre and MSWC in lobbying both the provincial and federal governments to allow the town to utilize the over 300 units of maintained housing that exists on the air base. He also mentioned that he would like to see some of the construction workers housed there instead of in a camp located outside of town. We at the MSWC would rather see the air base units used for permanent affordable housing for residents of the area than for a temporary construction camp – with considerations of fairness and safety for local resident women being preeminent.

It is our expectation that parents working in the new development will need high quality, public child care. However, income matters little if the current shortage of child care spaces is allowed to continue. "Plans to increase the daycare capacity at the CNA Happy Valley-Goose Bay campus" cited by the proponent's EIS will be woefully inadequate, especially in light of the facts that the College's HV-GB campus is currently not offering its Early Childhood Education program due to lack of enrollment, and that priority for space at the daycare is given first to students, then faculty, then employees of the College. NALCOR has also failed to recognize the unique childcare needs of women working within resource industries including in the constructions sites, needs that are not addressed by nine-to-five, Monday to Friday daycares. One also wonders what will inspire people to work in this under-waged, and traditionally female dominated, field when the cost of living increases dramatically and the aforementioned "Intrusive Rentier Syndrome" takes hold? On a related note, how will women who are already informally engaged in care for children, or support for ageing or disabled family members afford to continue to do so as the cost of providing this economically essential, yet unrecognized or underpaid contribution, becomes unmanageable? Poverty will certainly impact people's ability to pay for access to quality child care in HV-GB. How do we plan for the needs of children whose parents work shift-work or irregular hours in this period of rapid economic change? Will women be barred from participating in the non-traditional trades because of lack of child care? Finally, will demand increase in Happy Valley – Goose Bay, as it has in other similar municipalities, for female international migrants to work in the female dominated sectors such as providing personal care for the elderly, domestic services or sex trade work (Temple Newhook et al., 2011)?

<sup>&</sup>lt;sup>2</sup> "Some peripheral communities are high wage-cost locations. This is specifically so for small and medium-sized towns dominated by capital intensive industries paying high wages, which set the norms for the community: large pulp and paper mills; mines; aluminium smelters; etc. We have dubbed this <a href="the Intrusive Rentier Syndrome">the Intrusive Rentier Syndrome</a>. Its impacts can be devastating on local entrepreneurs seeking to diversify into other (wage sensitive) sectors, acting as a major impediment to the creation of a diversified export base." (Polese & Sheamur, 2003, p.xxv).

Further compounding the negative socio-economic climate will be the issue of mental health (psychosocial and psychiatric) along with alcohol and substance abuse, which according to the proponent's EIS, "is one of the most pressing health problems in the Assessment Area and is believed to be at the root of many other social ailments, such as homicide, child abuse and neglect, family dysfunction and suicide". These problems will only grow in a boom situation, when more expensive drugs will likely replace solvents and individuals and families feel the stress of a disrupted family life. There will be tremendous negative implications for individual physical and mental health, public safety, and social wellbeing. Our economic boom will exacerbate an illicit underground economy in the drug trade and prostitution. Fort McMurray once again provides a cautionary example. "Arrests for drug-related offences are 215 percent higher, and arrests for impaired driving 117 percent higher than those recorded elsewhere in the province. [...] The town's detox centres are overloaded, suicide counselling is all but maxed out and there is a crying need for more doctors" (Clarke qtd. On www.tarsandswatch.org). The reality that Happy Valley-Goose Bay does not have a detox or treatment centre, but has inadequate mental health services and supports nor other forms of comprehensive care, and already experiences a shortage of health professionals (due in no small measure to lack of appropriate housing and an inability to attract specialist health professionals) does not bode well. NALCOR's commitment to provide education and Employee Assistance Programs to its employees does not acknowledge the reality that EAPs rely on access to the existing (or in this case, non-existent) service infrastructure. Furthermore, this response does not mitigate the contribution of this project to the growth of the illicit economy and its ramifications for the public and public services within the host community of Happy Valley-Goose Bay.

In fact, the proponent's EIS makes no reference to how NALCOR will prevent and/or mitigate any of these socio-economic impacts, except by providing jobs, and by responding to the some of the more obvious individual impacts on its employees. The expectation that existing social service agencies and Provincial government departments will be able to handle the situations discussed thus far, and others not covered in this paper including the also typically neglected needs of the newly physically and mentally disabled as the result of workplace related injuries, is unreasonable and grossly irresponsible, especially coming from a Crown corporation that claims on its own corporate website to be committed to guiding principles of "Respect and Dignity, Teamwork , Honesty and Trust, and Open Communication" (<a href="http://www.nalcorenergy.com/consultation.asp">http://www.nalcorenergy.com/consultation.asp</a>). Furthermore, as a Crown Corporation NALCOR has an explicit and enhanced obligation (not less) to ensure the holistic wellbeing of the host community and its population. It should not be permitted to shed its responsibilities by suggesting that other governments departments will magically respond to the issues created and or exasperated by its initiative.

Accountability is seriously diluted in the process. Due to limited mandates and policy and program gaps, the issues but not the resources will ultimately be in the purview of the non-profit sector.

The confirmations by some government agencies that they anticipate being able to respond to these increased demands, without any clear investigation into nor assessment of their implications, or specific plans for mitigation, are equally disconcerting to local non-profit agencies like MSWC. Government services are currently inadequate and minimally responsive to local needs. Further, there are huge gaps in policy and related funding. It is no exaggeration to say that even if departmental and agencies live up to their existing mandates there still would be huge gaps. As highlighted in the Nunatsiavut Government's presentation on "Social and Cultural Concerns with the Lower Churchill Hydroelectric Generation Project" to the Joint Review Panel "NALCOR's review overlooks many adverse effects that are well documented in the literature" (10). The Nunatsiavut presentation outlines these negative effects for the Inuit who reside in the Upper Lake Melville region, and within the land claims area, as impacting "alcohol and substance abuse issues, mental health issues (including suicide), and other social

environment concerns such as child development" (10). The Nunatsiavut Government also acknowledges the fact that social service agencies in the region are already over-burdened, and thus will be unable to adequately cope with the increasing needs should the Lower Churchill Project progress. Keep in mind that "community well-being is a broad concept that includes physical, psychological, social and economic dimension ... and that the World Health Organization's definition of a healthy community is 'one that is continually creating and improving those physical and social environments and expanding those community resources which enable people to support each other in performing all the functions of life and in developing their maximum potential'"(as cited in, Temple Newhook et al., 2011).

## II. The Socio-Economic Assessment and the Labour Market

Our research shows that the Mackenzie Valley Environmental Assessment Report of 2005<sup>3</sup> provides a comprehensive framework for approaching socio-economic impact assessments. This report includes an understanding of and criteria for identifying the downstream social impacts on local women and local communities. We believe this approach should have been used here by the proponent, NALOR Energy, in preparing its assessment of the socio-economic impacts of the Lower Churchill development. An inadequate assessment process has lead to the erroneous conclusion that there will be no significant social impacts on women and the community. For instance, NALCOR has not conducted case studies of the tangible impacts of previous large scale developments in this community. If we fail to look it means we do not know – it does not mean that the impacts are not there. They are real because the MSWC and other community organizations such as the Labrador Friendship Centre continuously observe and respond to these impacts from previous developments.

Furthermore, the NALCOR assessment process has not shed sufficient light on existing issues like housing, mental health supports, women's safety, childcare, and poverty, to name a few. The social infrastructure including but not limited to child care options; adequate and affordable housing; mental health (psycho-social and psychiatric); drug abuse interventions; sexual assault and sexual exploitation services and supports; justice system supports for victims and interventions that ensure offender rehabilitation and safe reintegration are already profoundly deficient. Without identifying and acknowledging the truth and having explicit plans and targeted resources, an already stressed social infrastructure will crack – NALCOR and those involved in resource extraction and wealth generation may not look and therefore may not know, but the MSWC and other service agencies will because the casualties of this neglect do, and will, arrive on our doorsteps.

But, it is not too late for this Panel to ensure the implementation and use of the Mackenzie Valley Report's framework for the assessment of social issues within the community. In addition, these guidelines should inform directives to NALCOR and its subcontractors and recommendations to the federal and provincial governments. As decreed by the Tongamiut Inuit Annait Ad Hoc Committee on Aboriginal Women and Mining in Labrador (1997), a "Detailed gender analysis must be part of all

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<sup>7</sup> The Mackenzie Valley Report includes many guidelines, but a particularly key one is that, "Gender-based assessments and a greater understanding of community social dynamics (including more voice for women, youth and elders) will improve environmental impact assessment" (10).

aspects of the Environmental Assessment Review Panel: baseline research, impact assessment, mitigation and monitoring". This gender analysis but be intersectional (CRIAW, 2007) and thus not just apply to employment and economic sectors but to all sectors that ensure the wellbeing of women throughout the community<sup>4</sup>.

In addition, we would like the Panel to address the issue of women's participation in the labour market as part of the assessment of how successful this development is expected to be. We expect a large influx of workers (mostly male) into the region over the next few years. Given that this project is to be developed within the public sector, we believe there is an important opportunity for public funds to be dedicated to ensuring long-term local benefit. What provisions are being made to assure the local community that they will be considered for these new jobs? Will the labour movement be involved in negotiations about training women in non-traditional trades? Will there be resources dedicated to preapprenticeship training so that women workers will be ready to apply for apprenticeships when the development begins? Will the employer be committed to ensure prevailing wage rates are paid all through the contracting cycle? Will these be unionized positions?

As regards women's employment in the main project or spin-off economic activities in the community, we wonder to what extent does the Proponent (or its sub-contractors) expect to contract workers through the federal government's Temporary Foreign Worker Program? If foreign workers are brought into the community, we believe the province has a critical responsibility to ensure they will be living and working under good conditions. We want to know their health and safety will be assured both at work and at home. Will the province require that all migrants under the TFWP are properly registered with the province?

We would like to see a mechanism for the community to engage in independent monitoring, evaluation and decision-making of the impacts of this development over the years of its construction and afterwards. In part, we see a need for an ongoing community consultation and decision-making body. As well, there should be funds set aside for these research and evaluation processes so that the gendered dimensions of all aspects of the development can be sufficiently understood.

#### Recommendations:

The MSWC and FemNorthNet have the following recommendations for the Joint Review Panel as they continue their work, and for NALCOR in their future plans for the Lower Churchill development:

The Panel declare a moratorium on proceeding with developments until the following measures have been addressed:

1. NALCOR undertake and appropriately resource a gender-based analysis, including resources for direct contributions to the gender-based analysis from Mokami Status of Women's Council and the Labrador Friendship Centre among others. The framework for this gender-based analysis will identify both employment and broader socio-cultural issues and draw upon existing tools including the Community

<sup>4</sup> For a comprehensive framework for gender based analysis see: Clow, B., Pederson, A., Haworth-Brockman, M., & Bernier, J. (2009). Rising to the challenge: Sex- and gender-based analysis for health planning, policy and research in Canada. Halifax: Atlantic Centre of Excellence for Women's Health.

Genuine Progress Index (GPI) for Atlantic Canada and the Mackenzie Valley Review Board social and economic impact assessment framework. The specific indicators and benchmarks will be determined in cooperation with local organizations recognized as appropriate representatives of women and families in the communities affected.

- 2. NALCOR, in cooperation with MSWC, develop a parallel and integrated monitoring process (as recommended in the GPI) with case studies of previous developments in the region pertaining to the experience of and impacts on local women including women who flow in and out of the specific community due to social relationship links and services.
- 3. NALCOR develop and maintain a continuous, solid working relationship with the Mokami Status of Women Council through meaningful consultation and collaboration on the prevention and mitigation of negative socio-economic impacts on women in the communities affected.

Once the gender-based analysis has been completed and benchmarks established, the Panel approve development that includes the following measures:

- 1. NALCOR and the Provincial government implement the monitoring process identified above with regular and at least annual, reporting to the communities about changes from the baseline, preventative and mitigating efforts, successful efforts and challenges. The reporting process will also include feedback from the communities affected on the changes and efforts of NALCOR and the Provincial government.
- 2. NALCOR and the Provincial government ensure ongoing funding to MSWC, and other social-economy agencies in the region, so that they can contribute to the on-going monitoring process and deal with the inevitable socio-economic impacts in the Upper Lake Melville area and coastal communities of Labrador.
- 3. NALCOR ensure that the sub-contractors that work for the Lower Churchill Project are held to the same equity and diversity standards as the parent company, NALCOR Energy.

We believe that it is only through the adoption and meaningful follow up of these recommendations by NALCOR that the Lower Churchill Hydroelectric Generation Project can be a truly responsible and sustainable development for Labrador and its people.

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