



TS DGG-02

Topic: Mitigation effectiveness, Significant Impacts and the Purpose of Environmental Assessment

Reviewer Preamble:

In the response to Review Board Overarching IR 3 the GNWT noted that it “has not completed a systematic review of the effectiveness and limitations of each of its programs and plans”.

This introduces a fundamental issue in the assessment process. The purpose of Measures is to bring impacts below a significance threshold. Without understanding if the past mitigations have been effective, it creates a great deal of uncertainty around the confidence of future mitigation effectiveness. Parties cannot be confident that the mitigations arrived at will be effective.

In short, it is not clear if the impacts from the Tł̨ch̨ Highway have been significant, with the supplementary question on whether that was incidental or due to the mitigations.

Reviewer Request:

Please provide clear and complete answers to the following:

- 1) Understanding the contributing factors, does GNWT believe that any effects from the Tł̨ch̨ Highway have been significant?
- 2) Does GNWT believe that the monitoring and mitigations due to Measures were effective in reducing the impacts below the significance threshold?
- 3) Since 2021, please indicate:
 - a. The total budget for the programs cited as part of the social and well-being ‘net’
 - b. The amount of funding provided to support monitoring and managing of affects specifically associated with the Tł̨ch̨ Highway.
- 4) In the three years prior to 2021, what was the total budget for:
 - a. The programs cited as part of the social and wellbeing ‘net’
 - b. Any TASR specific monitoring projects.



Response from the Government of the Northwest Territories:

1 and 2) As noted in MVEIRB-03, the Government of the Northwest Territories (GNWT) and the Tłı̨chǫ Government worked collaboratively to advance measure implementation for the Tłı̨chǫ Highway. This is evidenced through the annual Measure reports¹ to the Mackenzie Valley Environmental Impact Review Board (MVEIRB) on health and wellbeing that the Tłı̨chǫ Government and the GNWT share responsibilities in implementing. It is important that parties acknowledge, in assessing impacts of the Tłı̨chǫ Highway since construction began, that significant changes in social and environmental conditions outside of the project have affected communities across the territory in ways that we are all still working to understand. This adds another layer of complexity to determining effectiveness of measures, and also to attributing direct and indirect impacts since construction began (e.g., COVID-19 and wildfire evacuations). Most importantly, the GNWT respects the role and voice of the Tłı̨chǫ Government in determining significance. The GNWT has seen a decline in some social indicators in the Tłı̨chǫ region since the opening of the Tłı̨chǫ Highway. The GNWT has also seen a decline across the territory during this same time period (See Covid Social Indicator Report²) and is working with the Tłı̨chǫ Government through the monitoring process to understand them. The GNWT has and will continue to work closely with the Tłı̨chǫ Government both in measure implementation and in the regular delivery of services and programs. The environmental assessment system in the Northwest Territories requires reflection on the volatility of recent conditions and an understanding of factors that can and cannot be managed using traditional quantitative, assessment approaches and that do not incorporate the voice of self-government partners who also have jurisdiction. The Tłı̨chǫ Government's voice is critical, as they also have jurisdiction

3 and 4) Budgets for programming related to health and social services are not dependent on whether communities have highways, or the construction of highways. Multiple government budgets are involved and responsible for program and service delivery (i.e. Tłı̨chǫ Government under their final agreement, territorial government, federal government) and the GNWT cannot speak to whether or not there have been changes in their delivery of health promotion programming and services.

The GNWT will continue to carry out engagement on the proposed mitigations and remains open to working with communities as the project advances to refine them, if needed. The proposed mitigations will complement the GNWT's existing programs and services to prepare communities to participate in economic benefits associated with the project and to respond to negative effects. As required, adaptive management responses will be developed collaboratively with communities through the appropriate sub-working group.

The Social Monitoring and Adaptive Management Sub-Working Group that has been proposed as part of the Community Readiness Strategy will be responsible for annually monitoring changes in community wellbeing indicators related to project activities and/or effects and responding with appropriate adaptive management measures.

As part of the development of components of the Community Readiness Strategy for the Project, the GNWT and communities will work together to determine whether and how to make use of community resources as part of the development and implementation of mitigation measures to address human health and community wellness. This will ensure that mitigations are appropriately responsive to community needs. The GNWT is continuing to engage with communities on the proposed mitigation measures related to health and wellbeing and will continue to do so throughout the environmental assessment process.



Implementation of proposed mitigations is contingent on several considerations, including:

- Mitigation discussions during the environmental assessment;
- Which mitigations are recommended by MVEIRB and ultimately accepted through the final Ministers' decision on the Report of Environmental Assessment (REA);
- A formal GNWT decision to advance the project to construction; and
- Receipt of funding to construct the Project.

Additionally, the GNWT is proposing to advance development of the Mackenzie Valley Highway Corridor Working Group and the Community Readiness Strategy a minimum of one year prior to the start of construction.

¹ See Annual Measures Reports: <https://reviewboard.ca/registry/ea-1617-01>

² <https://www.hss.gov.nt.ca/sites/hss/files/resources/social-indicators-covid-19-pandemic-june-2022.pdf>



Topic: Todd Slack DGG03 – Acknowledged Significant Impacts and the Need for Measures

Preamble from the Reviewer:

“GNWT has acknowledged that there are to be significant impacts as a consequence of this project. In addition to any other significant impacts found by the Board, these will require Measures (mitigations) to reduce their impact below the significance thresholds. DGG wishes to ensure that there is clarity amongst the proponent and the parties that this is a required outcome.”

Reviewer Request:

- 1) “Can GNWT confirm that Measures will be required for those areas where GNWT predicts significant impacts will occur.
- 2) GNWT has established that there will be a significant impact. Can they provide a narrative description of the significance threshold(s) that the mitigations must lower the impact below? If the project has a value (numeric or narrative) or monitoring in place, what effects within Délı̄ne represent a call for greater action (understanding that this is a work in progress)?
- 3) Does GNWT believe that Measures will be need for those areas that do not have plans, but are not yet acknowledged as having significant effects?”



Response 1

Yes, measures may be required in those areas where the Government of the Northwest Territories' (GNWT's) assessment of socio-economic and biophysical impacts indicates that significant impacts will occur. These measures may focus on reducing or avoiding certain effects that are attributable to the Project. The decision on whether and how to impose measures will be reflected within the final decision of the responsible ministers on the Mackenzie Valley Environmental Impact Review Board's Report of Environmental Assessment and Reasons for Decision for the project.

The GNWT has carried out engagement on the proposed mitigations and remains open to working with communities as the project advances to refine them, if needed. The proposed mitigations may complement the GNWT's existing programs and services to prepare communities to participate in economic benefits associated with the project, and to help mitigate potential impacts. As required, adaptive management responses will be developed collaboratively with communities.

The GNWT encourages representatives of the Délı̄nę Got'ı̄nę Government to participate in upcoming community sessions so that the GNWT can better understand community concerns. As parties meet and discuss issues during the Environmental Assessment process, the GNWT anticipates that there will be opportunities to identify measures that may be appropriate.

Socio-economic

In order to mitigate adverse effects that are attributable to the Project, the GNWT has committed to develop and implement a Community Readiness Strategy that includes several interconnected plans that are intended to address potential adverse socio-economic effects including those socio-economic effects that have been identified as significant (i.e., social pressures, public safety). The Community Readiness Strategy outlined in Sections 9.16.1 and 9.16.2 of the Developer's Assessment Report (DAR) describes the overall approach to mitigation for socio-economic effects that considers the benefits for communities, as well as adverse effects on socio-economic Valued Components (VCs). The development and implementation of the Strategy would be supported by a Mackenzie Valley Highway Corridor Working Group (MVHCWG) and three Sub-Working Groups. Two of the sub-working groups, a Road Safety and Security Sub-Working Group and a Contractor Training and Employment Sub-Working Group, would be responsible for the development and implementation of focused plans that include specific commitments and mitigation measures. The third, the Social Monitoring and Adaptive Management Sub-Working Group, would be responsible for developing and implementing the Social Monitoring Plan and developing a Well-Being Adaptive Management Plan that identifies additional activities / measures to be put in place as indicated by monitoring results. All plans will be developed in collaboration with communities and will build on existing programs and services that the GNWT currently offers across the NWT.

Biophysical

Please see the GNWT's response to MVEIRB IR#62 regarding the residual effect and cumulative effects of the Project on boreal caribou from change in habitat, which are predicted to be significant. These significant effects arise out of pre-existing conditions.



The GNWT also predicts a potential significant effect on noise at certain receptors in Tulita, in particular if the Project's construction activities were to occur at the same time as those of the reasonably foreseeable Great Bear River Bridge project. To mitigate for potential significant cumulative effects on noise, where possible, the GNWT can plan the location or schedule of specific project activities so they do not locally overlap with those of the Great Bear River Bridge, if that Project is advanced for construction in the near term. It is the GNWT's opinion that this is not required as a Project-specific measure, because the potential overlap leading to the significant effect is currently unknown.

The GNWT has predicted that potential increased fishing pressure at watercourses containing large-bodied fish could result in overfishing, which has the potential to adversely affect large-bodied fish populations. Owing to considerable uncertainty in this prediction, the GNWT has applied a precautionary approach to conservatively assume that this could result in a significant effect on fish health. To address the uncertainty, the GNWT has proposed to work with the Sahtu Renewable Resources Board and other resource managers to address uncertainty regarding the effects of increased access created by the Project on harvested resources in the assessment areas. This could include monitoring of harvest and recreational fishing that can be used to identify the need for management actions to be taken by the appropriate resource management organization, if needed.

Response 2

Socio-economic

With respect to socio-economic effects, there are no quantitative threshold(s) for determining significance. Mitigations for the potential significant adverse socio-economic effects of the Project are intended to respond to and account for existing baseline conditions as well as anticipated Project effects. The goal of the Project, including mitigations, is to contribute to healthy, vibrant communities that are more affordable and accessible by reliable public infrastructure, particularly given the uncertainty that remote communities with limited access face as a result of climate and environmental change. The effectiveness of mitigations related to the provision of health and wellness programming focused on drug and alcohol use is contingent on both the uptake and the response of individuals to programming. It is not possible to predict with certainty the degree to which mitigation measures will influence the choices individuals might make with respect to drug and alcohol use or treatment.

The proposed Community Readiness Strategy and the associated MVHCWG / Sub-Working Groups and plans, particularly the Social Monitoring Plan and the Well-Being Adaptive Management Plan, are intended to be developed collaboratively with communities. Additionally, the monitoring and follow-up framework for socio-economic VCs will employ an adaptive management approach by the appropriate authority(s) to ensure that monitoring of and mitigations related to Project effects are responsive to community needs and existing conditions.

Biophysical

Please see the GNWT's response to MVEIRB IR#62 regarding the residual effect and cumulative effects of the Project on boreal caribou from change in habitat, which are predicted to be significant. These significant effects arise out of pre-existing conditions.



Response 3

The level of confidence in the assessment of residual effects depends on the degree of uncertainty associated with the basis for the determination of significance. Uncertainty will be influenced by factors such as the adequacy of available data, the level of knowledge and understanding about the valued component being assessed, the characteristics of the proposed Project or technology, the nature of the Project-environment interaction, prior experience with similar projects in similar environments, and the efficacy of proposed mitigation.

Monitoring and adaptive management can assist in reducing uncertainty and is also a critical component of the approach to socio-economic mitigations. This will ensure that if monitoring suggests that initiatives or actions are appropriate to address Project effects, action can be taken with communities to ensure that the response is appropriate to the nature of the Project effect and the needs of the community in addressing that effect. The GNWT has discussed uncertainty in predictions throughout the DAR (e.g., Section 9.14) and proposed how monitoring and adaptive management is appropriate to address the uncertainty. An overview of how monitoring and adaptive management will be used is included below.

Socio-economic

An assessment of Project's potential socio-economic effects has been completed (refer to Section 9 the DAR), with two effects in the Human Health and Community Wellness (i.e., social pressures and public safety) having potentially significant adverse effects. The GNWT has proposed and is able to plan and implement reasonable Project-specific mitigation measures in order to reduce adverse effects.

The monitoring and follow-up framework for socio-economic VCs (Section 9.15.2 of the DAR) will focus on substantive (e.g. support of the development of plans and understating potential effects) and procedural (e.g., the process by which working groups operate and plans are developed) aspects of the proposed Community Readiness Strategy. This framework supports understanding any changes in existing conditions of socio-economic VCs in the Local Assessment Area (LAA) and Regional Assessment Area (RAA), the effectiveness of mitigation measures, accuracy of effects prediction as documented in the DAR (both Project-related effects and cumulative effects), and potential new/emerging effects of the Project that were not identified in the DAR. Additionally, as part of the Community Readiness Strategy, the GNWT will develop a Well-Being Adaptive Management Plan that identifies additional activities and measures to be put in place as indicated by monitoring results. The plan will (as will all plans) be developed in collaboration with communities and will build on existing programs and services that the GNWT currently offers across the NWT, where they exist.



IR Todd Slack DGG04

Topic: IR Todd Slack DGG04 - Ensuring sufficient information to complete the steps of an Environmental Assessment

Reviewer Preamble:

“Given the EA Terms of Reference are quite explicit in terms of the Key Lines of Inquiry, the lack of information around social and economic considerations creates quite a limitation in the actual assessment of effects. When coupled with lack of proposed mitigations and the uncertainty of mitigation efficacy, it leaves Parties in a difficult position to be able to effectively utilize the EA process. MVH has had a decade with this project and has not yet developed the necessary plans – making the choice to do so after the EA. This is not acceptable.

Déłıne understands and supports that the project approach of working with the impacted communities to develop and deploy mitigations and monitoring. To undertake the development of these management steps after the EA creates a power imbalance in addition to the compromised assessment – should there be a conflict on the necessary mitigation post-EA, GNWT retains all decision-making authority.

At a minimum, the Proponent should create an outline, based on its experience with its other road projects, that provides clear commitments (stated and funding), goals/objectives, and criteria (where able) that will represent the initial ideal for the management effort. DGG doesn’t believe that this is reinventing the wheel as we are learning from the successes and failures of the past - this may simply be porting over the management structure for TASR. This represents a minimum proposal that allows assessment and the creation of commitments in the EA process. Déłıne acknowledges that these are drafts for consideration, to be worked on by the eventual Mackenzie Valley Highway Corridor Working Group.”

Request from Reviewer

“In order to facilitate assessment, please provide an initial framework that provides best management and monitoring practices developed from the Inuvik to Tuktoyaktuk Highway (ITH) and Tłchq All-Season Road (TASR). DGG accepts that this represents only a base case for the MVH, with meaningful, collaborative, design work yet to come. Specific Questions:

- 1) The creation and activation of the Corridor Working Group allows only one year (prior to construction) to create the sub-groups, approve plans, and provide all coordination. During this time there is only two meetings planned for this group. This feels like a monumental effort – given the standup and composition of the body is yet to be completed. For these plans or themes not to have a working draft or starting proposal, never mind not even being initiated, is troubling as it’s the first KLOI and Déłıne’s largest concern. Given the pace of government initiatives can be quite slow (see GNWT 2023 Fire Review which just started), this feels inadequate given the significance. Given the political desire for this project to proceed makes the core question of its development a ‘when’ rather than an ‘if’, what rationale does GNWT have for not initiating this



- work immediately?
- 2) Similar to the time constraints around the Corridor Working Group, the sub-groups will have less than a year prior to construction (allowing for the larger group to meet and agree to sub-group membership) to collectively draft, review and approve drafts, issue them for the working group's consideration. This is to be done with only 4 meetings and with limited support and unclear processes. Is this reasonable?
 - 3) Délı̄nę is not one of the local affected communities but will be exposed to indirect and community effects that DGG believes require monitoring and mitigation. Does GNWT accept that communities in the RAA have an important perspective and will be exposed to impacts in similar ways as other communities (i.e. drugs and alcohol will be much more accessible) and should be members of the steering committees created as part of the corridor working group?
 - 4) DGG notes that there are two positions described in the DAR – one charged with coordination and one with SEIA monitoring.
 - i) Relative to Construction start, when will these two positions be hired?
 - ii) Given the critical nature of the work (KLOI, significant concerns, primary community interests), this seems insufficient overall. If this project were approved, how many other staff does GNWT believe would be working on the project?
 - iii) If unknown, can the proponent anticipate the comparative level of staffing between socio-economic issues and others – would staff associated with avoiding, monitoring and managing impacts to communities amount to 1% of staff?
 - 5) In the TASR process, DGG understands that TCG was the central body for the working groups. The current proposal has GNWT as the central coordinator.
 - i. What was the rationale for the change?
 - ii. Is GNWT open if other orders of government believed that a non-GNWT member should be the chair or coordinator?
 - 6) Given the power imbalance between different orders of government post-EA (where GNWT has complete freedom of action in an area of public governance where it's the only real authority), what conflict resolution recourses will GNWT institute for the Corridor Working Group if there are strong disagreements in approach or needs?

DGG does not believe that this is likely, but this is an issue introduced by the proponent's choice to develop core mitigations outside the environmental assessment process. If community and Indigenous governments cannot assess during the EA and satisfied with the mitigations, this will be moot, but it's a necessary requirement in case there are intractable disputes on the mitigations necessary to reduce impacts below significance."



Response from the Government of the Northwest Territories:

Request 1 and 2

The Government of Northwest Territories (GNWT) thanks the Délı̄ne Got'ı̄ne Government for their comments related to the timing of the working groups associated with the Community Readiness Strategy.

As outlined in the Developer's Assessment Report (DAR), the GNWT is proposing to advance development of the Mackenzie Valley Highway Corridor Working Group (MVHCWG) one year prior to the start of construction. The purpose of this action is to ensure that communities are able to benefit from the training, employment, and business opportunities associated with the project, as well as adapt or prepare for other project impacts. The GNWT has heard a desire from communities to commence this work as soon as possible. The GNWT would like to clarify our commitment, in that we commit to establishing these working groups and related sub-committees a minimum of one year prior to construction. Specific commencement dates will be established through further discussions with communities.

Request 3

The GNWT agrees that all communities in the region have important perspectives and that their input needs to be considered in plans and programs.

The details of participation in the MVHCWG and the three Sub-Working Groups envisioned as part of the Community Readiness Strategy have not yet been confirmed. It is anticipated that representatives would be identified collaboratively with communities. The GNWT has carried out engagement on the proposed mitigations and remains open to working with communities as the Project advances to refine them, if needed. The proposed mitigations may complement the GNWT's existing programs and services to prepare communities to participate in economic benefits associated with the project. As required, adaptive management responses will be developed collaboratively with communities. Implementation of proposed mitigations is contingent on several considerations, including:

- Mitigation discussions during the environmental assessment;
- Which mitigations are recommended by MVEIRB and ultimately accepted through the final Ministers' decision on the Report of Environmental Assessment (REA);
- A formal GNWT decision to advance the project to construction; and
- Receipt of funding to construct the Project.

Request 4

The GNWT fiscal and staffing commitments to the MVHCWG and sub-working groups are outlined in Section 9.16 of the DAR and have also been included in the Response to IR JS DGG01.

It is anticipated that the GNWT positions referenced would be sought through project funding approvals. Proposed staffing is assumed to be sufficient as the GNWT staff will be working alongside other staff in the relevant GNWT departments and the MVHCWG.



Request 5

While the Tłı̨chǫ Government has played a critical role in the Tłı̨chǫ Highway working groups, it has not acted as a central coordinating body. The central coordination role is instead provided by the GNWT's Department of Infrastructure with support provided by the Department of Health and Social Services and other GNWT Departments. The Tłı̨chǫ Government has played a lead role in the TASR Socio-Economic Working Group with support from the GNWT.

The GNWT is committed to a participatory, collaborative, and community-driven approach to forming the MVHCWG and the Sub-Working Groups. Since community engagement sessions are ongoing, the specific details of the MVHCWG and the three Sub-Working Groups have yet to be developed.

Request 6

The GNWT appreciates the Délı̨nę Got'ı̨nę Government bringing this issue forward for consideration as part of next steps in the development of the Community Readiness Strategy. The GNWT is committed to ensuring that the structure and format of the MVHCWG and Sub-Working Groups is created in a way that supports meaningful and consistent community participation.

Creating a strong, equitable framework for dialogue and engagement on mitigations is central to the adaptive management approach proposed for the Project. This will include setting clear shared expectations for roles and responsibilities related to identification and development of initiatives under the Community Readiness Strategy and associated Plans, in order to support accountability for action and results. The GNWT will continue to explore this issue with communities through ongoing engagement and collaboration, as well as through the establishment of Terms of Reference needed to implement the MVHCWG/sub-working groups envisioned under the Community Readiness Strategy. The GNWT is open to discuss suggestions communities have regarding conflict resolution mechanisms that could as part of ongoing engagement on mitigations.



Topic: Todd Slack DGG 05 IR 4 – Visual Timeline of Construction and Socio-Economic Programs

Reviewer Preamble:

“DGG is concerned that the project timeline lacks flexibility and as currently designed, will limit options and result in less than ideal outcomes. However, from our perspective, we have a limited comprehension as to how the different parts of the project come together.”

Reviewer Request:

“Please provide a compiled timeline that looks are the activities of each of the sub-groups within the Corridor Working Group. While we leave the key points to the developer, DGG’s interest is in removing uncertainty around these matters. For instance, the timeline should include the project’s RFP issuance, the awarding of principal contracts, any critical subcontracting dates, as well as notable construction dates. - DGG understand that these dates are to be determined, so suggest that the project uses a nominal temporal scale based on the construction date, with all points referenced to that origin. Thus, the corridor working group start date is C-365 (one year prior).”



Response from the Government of the Northwest Territories:

The GNWT is continuing to engage with affected communities to discuss the proposed socio-economic mitigations and commitments outlined in the Developer’s Assessment Report (DAR) that are proposed as part of the Community Readiness Strategy. At this time, any changes or updates to the mitigation strategies have not been identified or confirmed, including details on a possible implementation timeline outside of those currently proposed in the DAR for the Community Readiness Strategy, the associated Mackenzie Valley Highway Corridor Working Group (MVHCWG), Sub-Working Groups and plans. Any updated information or adjustments to the Community Readiness Strategy that may be identified as a result of community engagement would be filed with MVEIRB at a later point in the environmental assessment (EA) process.

As outlined in the DAR, the GNWT is proposing to advance development of the Corridor Working Group a minimum of one year prior to the start of construction. The purpose of this action is to ensure that communities are able to benefit from the training, employment, and business opportunities associated with the project, as well as adapt or prepare for other project impacts. The GNWT has heard a desire from communities to commence this work as soon as possible. The GNWT would like to clarify our commitment, in that we commit to establishing these working groups and related sub-committees a minimum of one year prior to construction. Specific commencement dates will be established through further discussions with communities.

We encourage DGG to participate in the upcoming community sessions so the project can better understand community concerns.

Sections 5.4.1 and 9.2.5.2 of the DAR provide conceptual schedule information on the construction of three consecutive segments beginning in approximately 2027. The conceptual schedule assumes the Project would be fully constructed and provide all-season connection to Norman Wells sometime between 2041 and 2046. As noted in the Reviewer Request, the dates for various other Project milestones (e.g., the Project’s RFP issuance, the awarding of principal contracts, any critical subcontracting dates, as well as notable construction/operation dates) have not been determined. A number of factors can influence the timelines for the process and when milestones may be achieved, such as the completion of the EA process, completion of the permitting/licensing process, confirmation of funding for the Project, detailed project design, procurement approach, etc. As such, a meaningful visual timeframe for more detailed Project activities for the pre-Construction, Construction, and Operations and Maintenance phases cannot be provided at this time. The timing of these project aspects will become more predictable as we approach a final construction decision for the project.



Topic: Todd Slack DGG 06 IR 5 – Describing What a Successful Project Looks Like – Economic Benefits

Reviewer Preamble:

“DGG believes that all parties would benefit from a narrative description that provides some details that expand on the project’s goals or intentions with regard to economic benefits and how we know that they have been achieved. DGG leaves this to the proponent to write, though we ask for some simple metrics to be included. For example, the 50% northern hiring target is a useful, simple statement that addresses the interest of knowing what general positives can be expected out of the construction phase.”

Reviewer Request:

“Please provide a short general description of what benefits this project will result in from a community point of view, with regards to training, employment, and contracting.”



Response from the Government of the Northwest Territories:

There are several anticipated positive effects or benefits of the Project related to training, employment, and contracting, and these are discussed in Section 9.6 (Assessment of Potential Effects on Education, Training and Skills) and Section 9.7 (Assessment of Potential Effects on Employment and Economy) of the Developer's Assessment Report (DAR).

Details on the potential positive effects anticipated during both the Construction and Operations and Maintenance phases of the Project are summarized below.

Construction Phase

- An increased portion of the population in the LAA and RAA may complete high school and pursue trades-based training and skills development.
- Potential increase in employment and business opportunities for local residents and businesses.
 - As noted in Section 9.7.2.1.1 of the DAR, it is assumed that approximately 50% of the Project workforce will be from the local Sahtu and Dehcho communities or from elsewhere in the NWT.

Operations and Maintenance Phase

- Anticipated improved access to education and training.
- Anticipated positive impact on the ability of local communities to attract and retain teachers and adult educators by reducing travel costs and increasing available modes of transportation.
- Potential opportunities for economic development, (e.g., enhanced tourism, arts and crafts, and existing and new businesses).

The DAR outlines a series of measurable parameters related to education, employment, and training in section 9.2.4.2, and parameters related to employment and the economy in section 9.2.4.3. These parameters may be used to monitor effects during both the Construction and Operations and Maintenance phases of the Project. Parameter selection and availability of information/data will be discussed during the development of the Social Monitoring Plan and the Well-Being Adaptive Management Plan that are part of the proposed Community Readiness Strategy, described in Section 9.16.2 of the DAR.

Measurable parameters for education, training, and skills that could be used to demonstrate the Project's positive effects during the Construction and Operations and Maintenance Phases include the following:

- Percent (%) of the population with a high school diploma, certification/training, or more.
- Number (count), type, and location of certification/training and skills development programs offered and accessed.

Measurable parameters for employment that could indicate the Project's positive effects during the Construction and Operations and Maintenance Phases include the following:

- Project employment.



- Employment/unemployment rates for Indigenous/non-Indigenous labour force participants.
- Labour force participation rates.
- Average annual personal income.
- Project expenditures on goods and services.
- Value and number of Project contracts issued to local, regional, and NWT businesses.

Additionally, as described in section 9.16.2.2 of the DAR, the GNWT has committed to establishing a Training and Employment Sub-Working Group to develop and implement a Contractor Training and Employment Plan in collaboration with communities. The Contractor Training and Employment Plan is intended to enhance the anticipated potential positive effects of the Project on education, training and employment. The details of the Contractor Training and Employment Plan have yet to be developed, as the intention is that the GNWT will work collaboratively with communities to develop the plans. However, the intention of the Training and Employment Sub-Working Group is that it will work to identify and address barriers to education, training and employment. Monitoring information related to potential Project effects on education, training and employment that is collected as part of the work of the Social Monitoring Plan referred to above would be shared with the Training and Employment Sub-Working Group to inform the development and implementation of the Contractor Training and Employment Plan.



Topic: Todd Slack DGG07 – Ensuring Benefits to Sahtu Residents from Project Construction – Skills/Training

Reviewer Preamble:

“DGG is deeply concerned that a significant portion of the envisioned benefits are at risk of not being delivered – through structural limitations and a lack of detailed planning and commitments.

DGG simply wants to ensure that all reasonable steps are being taken to prepare Sahtu residents to take advantage of the opportunities from the project. This means developing and deploying training and educational programs and where necessary, building infrastructure to support the delivery of programs, before the project commences.”

Reviewer Request:

1. The Plan commitments (s. 9.16.2.2.1) largely indicate identification of gaps/barriers, local resources, as well as other information gathering efforts. It does not commit to deliver programs that will increase skills, trades experience or hours, or actually expand the labour resource. If properly understood, the outcome of this project, on or near the start of construction, is largely informational rather than actions or programs that would serve to improve or remedy the labour situation.
 - a) Is the GNWT planning on delivery of any training or education programs that will improve the labour value in the Sahtu? For example, is the proponent intending to offer additional apprentice incentives targeted at the Sahtu? Are they providing improved higher education benefits for areas of study that may support the road construction? Is GNWT planning to work with local education authorities to improve grade school outcomes to broaden the pool of eligible students?
 - b) If the project fails to meet its northern hiring targets, what consequences will occur to the GNWT project staff and project oversight? Is it just Sahtu and northern residents that bear the cost of failure?
2. Please describe and evaluate potential effects of the project on the following, at both the general and community specific level:
Proposed education and training programs required for highway-related construction and operation employment, including:
 - i. Local and regional training opportunities;
 - ii. Timing and duration of programs, in relation to the highway development schedule;
 - iii. Skills and experience gained in the highway workforce that could be applied to other available projects or sectors;
 - iv. The number of people expected to be employable and available;
 - v. The potential for local development of skills for senior professional positions (e.g. labourer/heavy equipment operator vs. supervisor/manager)
 - vi. Proposed programs that would be provided by or sponsored by the developer.



3. How will GNWT ensure that this project is not like other large projects in the territory and that they will provide skills training and employment opportunities to Sahtúot'ine? What steps are they going to take that projects like Giant Mine did not benefit from?
4. Is the intent of the Contractor Training and Employment Plan to deliver training and improve northern employment?
5. Does the GNWT continue to believe that it can deliver on its socio-economic commitments, including the intent of Contractor Training and Employment Plan, within the year prior to construction starts?

On the face of it, there seems to be significant reason to doubt this. For contrast, at Giant Mine, a large public contracting project which has a decade of lead-up and site management, GNWT and Canada (co-proponents) have delivered virtually no training or education programs and have consistently not (perhaps never) met their northern employment targets, yet there seems to little consequence to any of the groups involved in the process (government staff, project staff, construction manager, contractors).

6. Délıne currently lacks the infrastructure to deliver skills and trades training programs. Is the GNWT willing to make a commitment with DGG's education department to design, fund, and construct an appropriate facility?
 - a) In the absence of an appropriate building, what steps/supports are the proponent taking to allow a broader range of potential students to attend schools/training outside their community?
7. What training targets or Key Performance Indicators does GNWT plan on establishing for this project? What does their research suggest are realistic and achievable goals for this project – what has been learned from other projects?
 - a) TASR seemed to have successfully delivered the expected socio-economic benefits to the Tłıchǝ Region. Can the GWNT provide further information on that process and the lessons learned that will be used with this project? Details on the development timeline used for socio-economic agreements, monitoring and mitigations would be ideal information.
8. How will GNWT contracting recognize training as part of bid proposals? GNWT's own promotion materials for the Canyon Creek All-Season Access Road make it plain how important resources and planning for training and employment was at the *beginning* of the project



Response from the Government of the Northwest Territories:

Request 1a and Request 4

The Government of the Northwest Territories (GNWT) is committed to a participatory, community-driven approach to mitigating the potential adverse socio-economic effects of the Project and maximizing the potential positive effects of the Project on affected communities. The GNWT has committed to developing a Community Readiness Strategy (Section 9.16.2 of the DAR) which would be developed collaboratively with communities.

Specific to education and employment-related effects, and as outlined in Section 9.16.2.2 of the Developer's Assessment Report (DAR), the GNWT will establish a Training and Employment Sub-Working Group as part of the Community Readiness Strategy that informs and supports the development and implementation of a Contractor Training and Employment Plan and reports to the Mackenzie Valley Highway Corridor Working Group (MVHCWG). The MVHCWG will collectively determine who should sit on the Sub-Working Group from the GNWT, education and industry partners, and community and Indigenous leadership and organizations.

As discussed in Sections 9.7.2.2 and 9.16.2.2.1 of the DAR, the intent of the Contractor Training and Employment Plan is to outline the overall approach to education, training and employment readiness for Local Assessment Area (LAA) and Regional Assessment Area (RAA) residents, so they can increase employment opportunities during construction and operation of the Project. The Contractor Training and Employment Plan will be developed by the Training and Employment Sub-Working Group in partnership with Aurora College and other education partners. The Plan will outline the overall approach to education, training, and employment readiness for LAA and RAA residents through leveraging existing programs, and augmenting them through adaptive management and as identified through monitoring. While the Plan has yet to be developed and finalized, in Section 9.16.2.2 of the DAR, the GNWT has made the following commitments regarding the Contractor Training and Employment Plan:

- Identify employment opportunities (types, numbers, timing/schedule and employment hiring requirements) during construction and operations, informed by information from the GNWT and contractors about the Project schedule and well in advance of the beginning of construction
- Identify availability of and gaps in skilled labour for construction employment opportunities in each of the communities including the creation of skill inventories, and seeks to address these to support optimizing training and employment opportunities
- Identify barriers to increasing uptake in education and training courses (e.g., restricted drivers licences) and develops potential solutions to implement
- Identify education, skills and training programs and courses required to address lack of available skilled labour for construction and operations in each of the communities, including sharing information about Labour Market Programs that can support communities, employers and organizations
- Identify education and training programs and courses currently available (and where (local



Community Learning Centre (CLC) or territorial campus site)/how offered (in-person/remote/blended)) and new programs and courses required to meet local need (as well as whether or not additional staffing and space requirements are necessary)

- Identify potential funding to support education and training prior to construction, during construction and operations
- Plan for employment and local opportunity catchment to reduce a surge in the required labour force during construction, reducing the potential for in-migration to the region
- Explore feasibility of building workshops in each community to support hands-on learning opportunities
- Identify existing programs that support cultural awareness and anti-racism training to mitigate potential adverse effects associated with presence of non-resident workers
- Ensure all communities are supported to prepare the workforce for employment opportunities through coverage of existing ECE programs and positions (e.g., Career Development Officers)
- Encourage communities to develop community labour market plans to evaluate their needs in relation to the Project.

The GNWT has carried out engagement on the above proposed mitigations and remains open to working with communities as the project advances to refine them, if needed. The proposed mitigations may complement the GNWT's existing programs and services to prepare communities to participate in economic benefits associated with the project. As required, adaptive management responses will be developed collaboratively with communities. At this stage, until the Sub-Working Groups are established, more specific details on their respective Plans cannot be fully articulated.

Communities are encouraged to participate in upcoming community sessions to help the GNWT better understand community concerns about the Project.

Request 1b

As expressed in response 1a, and in Section 8.2.6.1 of the DAR, GNWT has committed to developing and implementing an MVH Contractor Training and Employment Plan through the establishment of the Training and Employment Sub-Working Group. The Contractor Training and Employment Plan includes measures that require contractors to demonstrate how both local and Indigenous labour and businesses will be sourced and how local and Indigenous people are being trained to satisfy northern hiring targets. The GNWT will work closely with Indigenous Governments in the LAA and RAA via the Community Readiness Strategy sub-working groups to implement approaches that will work toward realizing northern hiring targets.

In concert with the Contractor Training and Employment Plan, the GNWT has also committed to implement an adaptive management and monitoring framework for socio-economic mitigation measures, which would be developed and supported by the Social Monitoring and Adaptive Management Sub-Working Group (as described in Sections 9.15 and 9.16 of the DAR). This approach is intended to enable the GNWT to consider augmenting existing initiatives, including contractor requirements for



northern hiring, if the Sub-Working Group suggests action is required based on monitoring results.

Requests 2i-v

As outlined in Sections 8.2.10 and 9.6 of the DAR, the effects of the Project on the levels of, and access to, education, training and skills are anticipated to be positive, as they will:

- Support increased levels of education and skills training among local residents, notably in the trades, especially during the construction phase, but also in the long-term during on-going operations and maintenance related to Project jobs.
- Positively benefit access to education programming and training during the operations and maintenance phase by allowing local residents greater all-season access to education and training opportunities offered outside their immediate communities.
- Positively affect the ability of local communities to attract and retain teachers and adult educators due to decreased travel costs that may occur when the Project reaches operations.

The Project is also anticipated to have an adverse effect related to the capacity of educational institutions, such as Community Learning Centres (CLCs), to meet the demand for education and skills training.

These effects, positive and adverse, may extend into the RAA communities but will be concentrated in the communities most directly affected by the Project (i.e., the LAA communities of Norman Wells, Tulita, and Wrigley) due to their proximity to potential construction and operations activities and jobs associated with the Project.

As outlined in Section 9.7.2.1.1 of the DAR, the Project is expected to result in three types of employment: direct, indirect and induced. Direct employment refers to the jobs arising as a result of the actual construction of the Project. Indirect employment arises from the additional economic activity generated as the result of the purchase of materials and services required for Project construction (e.g., diesel or trucking services). Induced employment refers to the jobs created when the wages and salaries paid by the workers hired through direct and indirect employment-related to the Project are spent in the community, generating additional economic activity (for example in grocery stores, retail outlets, and restaurants).

At this time, construction planning has not advanced to the stage where firm employment requirements or schedules are available. Only a general timeline and total annual workforce requirement has been determined for the purpose of the environmental assessment (EA).

As described in Sections 5.4.14 and 9.7.2.1.1 of the DAR, the estimated number of direct jobs expected to be created by the construction of the Project is approximately 200-330 full-time employees (FTEs) for each year of construction activity. These include approximately:

- 160-280 construction personnel (40-70 persons plus cross-shift at two work camps)
- 8-10 supervisors (4-5 supervisory personnel per cross-shift)
- 6 environmental / wildlife monitors (three per cross-shift)
- 24-30 camp services personnel (cooks, first aid, cleaning, and others per camp plus cross



shift)

- Construction administration and management personnel

In addition to direct construction employment, anticipated indirect jobs during the construction of the Project related to supply and resupply, waste haul, equipment and material supply, and personnel transport are also expected. The estimated number of indirect jobs is between 84 – 126 FTEs per year of construction, and the estimated number of induced jobs is between 40.5 to 60 FTEs per year of construction.

The GNWT has estimated that 50% of the construction workforce will come from the local Sahtu and Dehcho communities and from elsewhere in the NWT, with the remainder of the workforce coming from outside the NWT (as described in Sections 8.2.6.1 and 9.7.2.1.1 of the DAR).

As identified in Section 9.7.2.1.2, only a basic estimate of direct jobs required for operations and maintenance has been developed. The GNWT estimates that there would be a total of one supervisor, three or four operators and three or four casual positions required per maintenance camp along the Project, and that there would be a total of three camps once the Project is operational. In the winter, the numbers of jobs would be reduced to one supervisor and three or four operators. This is an estimated total of 21 to 27 positions in the summer and 12 to 15 positions in the winter, for an overall total of 33 to 42 positions. These new positions may result in changes to the local employment rates in each community, but given the small number of jobs, it may not be possible to see measurable changes in employment rates due to Project-related operations and maintenance jobs. As noted in Table 9.17 of the DAR, annual employment estimates amount to 25 direct, 7.4 indirect, and 2.9 induced FTEs¹. Annual employment effects are estimated at 35.3 jobs and over \$2 million in salaries and wages.

As indicated above, construction planning and workforce planning for operations and maintenance jobs has not advanced to the stage where detailed estimates are available. As a result, the more specific and community-level information requested by the Délı̄ne Got'ı̄ne Government regarding training opportunities; timing and duration of programs; skills and experience gained in the highway workforce that could be applied to other available projects or sectors; the number of people expected to be employable and available; the potential for local development of skills for senior professional positions is not available. However, as described in section 9.16.2.2 of the DAR, and the response to request 1a above, the GNWT has committed to establishing a Training and Employment Sub-Working Group to develop and implement a Contractor Training and Employment Plan, which is intended to enhance the anticipated potential positive effects and mitigate potential adverse effects on education, training and employment associated with the Project. The GNWT has made several commitments regarding the Contractor Training and Employment Plan that support the uptake of education, training and employment opportunities associated with the Project, which are outlined in response 1a above and detailed in Section 9.16.2.2 of the DAR.

¹ FTEs are not actual jobs but equivalent to full-time jobs (including part-time jobs).



While it is likely that the Contractor Training and Employment Plan will be finalized during the EA process, any updates or adjustments to the Plan that may be made following from engagement will be filed with the MVEIRB, if appropriate, at a later stage in the EA process.

Request 2vi and Request 3

At this time, GNWT has not committed to the development of new education or training programs related to the Project. The GNWT has proposed the Community Readiness Strategy (Section 9.16.2 of the DAR) to maximize the positive impacts of the Project on skills training and employment opportunities in the affected communities. The Community Readiness Strategy will leverage and augment existing programs and services available across the GNWT to mitigate potential adverse effects/enhance positive effects of the Project. A Social Monitoring and Adaptive Management Sub-Working Group reporting to the MVHCWG will be established (Section 9.16.2.3 of the DAR). This Sub-Working Group will develop and implement a Social Monitoring Plan and a Well-Being Adaptive Management Plan. The Social Monitoring and Adaptive Management Sub-Working Group will be responsible for annually monitoring changes in community well-being indicators related to project activities and/or effects and responding with appropriate adaptive management measures.

The adaptive management approach that underlies the Community Readiness Strategy (as described in Sections 9.15 and 9.16 of the DAR) is focused on leveraging and augmenting existing services and programs, and is consistent with the approach taken by GNWT for similar projects. For example, the adaptive management approach taken for the Tłı̨ch̨o Highway focused on continuing with existing programming and approaches to respond to socio-economic conditions and adapting their implementation when required as identified through collaborative monitoring activities with the Tłı̨ch̨o Government communities. The SEWG on this project did not identify any additional concerns or needs around employment and training, however, through this approach, programs and services have been successfully adapted to respond to the needs of communities.

As mentioned in the response to *Requests 1a and 4* the GNWT remains open to working with communities and other partners as the project advances to refine the mitigations, if needed, and encourages communities to participate in upcoming community sessions to help the Project better understand community concerns and support community readiness. As the project timeframe gets solidified and planning for construction approaches, the GNWT via the Working Groups/Sub-Working Groups under the Community Readiness Strategy will consider options. For example, in the North Slave Regional Office of GNWT-ECE, a Regional Training Partnerships was approved in 2023-24 to provide leadership in identifying and responding to short and long-term labour market needs in the North Slave. One of the main partners we have focused on is Giant Mine.

Request 5

The GNWT acknowledges the importance of delivering on its socio-economic commitments that are outlined as part of the Community Readiness Strategy.

As stated in Section 9.16.2 of the DAR, the MVHCWG and development of the Community Readiness



Strategy will begin 1 year prior to the start of construction, be active during construction and will remain in effect for five years post construction. The GNWT will continue to engage with affected communities to discuss the proposed socio-economic mitigations and commitments outlined in the DAR that would be addressed in the Community Readiness Strategy and associated Plans. The feedback from the Deline Got'ıne Government will be considered in relation to the proposed timeline for implementing the commitments and the Strategy/Plans along with other feedback provided during engagement.

The GNWT is open to working with communities to advance work on the development of the MVHCWG one year prior to the start of construction as outlined in the DAR (described in Section 9.16.2). The purpose of this action is to ensure that communities are able to benefit from the training, employment, and business opportunities associated with the project, as well as adapt or prepare for other project impacts. The GNWT has heard a desire from communities to commence this work as soon as possible. The GNWT would like to clarify our commitment, in that we commit to establishing these working groups and related sub-committees a minimum of one year prior to construction. Specific commencement dates will be established through further discussions with communities.

Request 6

That GNWT is not going to build a new education facility in Délıne to support education and training related to the Project. ECE provides support to residents to access education and training programs available to NWT residents. ECE also partners with post-secondary institutions when appropriate to support post-secondary programs and administers program options to support adults at different stages of their educational journey.

ECE offers two virtual programs that can support a broader range of potential students in accessing education and training (as described in Section 9.6.2.1.1 of the DAR):

- **Virtual Learning Strategist (VLS):** For registered apprentices, participants work with a Learning Strategist to address a range of areas including possible skill gaps, learning disabilities, exam anxieties, and other factors affecting performance, such as sensory challenges and deficits in study skills and motivation. This program includes development of customized learning plans, delivery of support services, or referrals to other entities for formal assessments and academic supports.
- **Build Your Skills:** An online support using trade-specific assessments to navigate on the job and technical training. This program provides academic supports and assistance for pre-apprentices and apprentices to build the foundational skills necessary to pass the Trade Entrance Exam or improve their technical training outcomes.

Further:

- The Apprenticeship, Trades and Occupational Certification (ATOC) program ensures those working in designated trades and occupations have competencies based on industry-approved occupational standards.
- The ATOC program is delivered regionally by Career Development Officers (CDOs), who assist with apprenticeship applications, coordination of apprenticeship contracts, and attendance at technical training. CDOs work with the employer and apprentice to ensure that the apprenticeship is



progressing.

- The Small Community Employment Support (SCES) Program provides funding to small NWT communities to support employment and training opportunities for their residents.
- Délı̄ne receives \$183K in annual funding from ECE through the SCES Program, which resulted in 11 jobs.

The GNWT's intention in designing the Community Readiness Strategy and associated Training and Employment Sub-Working Group is to work with communities to ensure that initiatives and existing programs are directed appropriately to support education and training needs. This includes collaboratively identifying any gaps and barriers related to education, training and employment needs, through adaptive management, which enables the appropriate authorities to consider augmenting existing programs to address community needs.

Request 7

At this time, the GNWT has not identified Project-specific training targets or Key Performance Indicators. Development of such targets or indicators may be part of the work of the Social Monitoring and Adaptive Management Sub-Working Group activities, including the development of /reporting on the Social Monitoring Plan and the Well-Being Adaptive Management Plan (as described in Section 9.16.2.3 of the DAR). The monitoring and adaptive management approach will be informed by lessons learned through the EA process for the Tł̄chq Highway.

As indicated above in the response to Request 5, the GNWT will continue to engage with affected communities to discuss the proposed socio-economic mitigations and commitments outlined in the DAR that would be addressed in the Community Readiness Strategy. This includes discussions related to the Social Monitoring and Well-Being Adaptive Management Sub-Working Group and associated Plans.

As mentioned in the response to *Request 5*, the GNWT has committed to establishing these working groups and related sub-committees a minimum of one year prior to construction.

Request 8

The GNWT will consider the training requirements as measures on contracts which will be expanded upon in the Contractor Employment and Training Plan under the Community Readiness Strategy. The MVH Contractor Training and Employment Plan will include measures to identify and support local education and training needs and work collaboratively with communities to leverage existing programs and services to ensure that community members have correctly identified the needed supports to access and obtain the required education and training programs that will prepare them for employment opportunities.



Topic: Todd Slack DGG08 – Ensuring Benefits to Sahtu Residents from Project Construction - Employment

Reviewer Preamble:

“As with other areas in the DAR, assessing this Key Line of Inquiry is difficult as there is a lack of information – leaving parties to seek key details to even understand the initial commitment. Instead of analyzing a draft proposal, we are forced to seek the information just to understand the commitment and the facts around any mitigation. In this case, it does not seem that the project is intending to deploy programs to improve the probable outcomes. For DGG, failure to deliver meaningful training, employment, and/or contracting benefits as part of a generational construction program represents a significant failure.”

Reviewer Request:

1. “GNWT commits to having 50% of the workforce drawn from the NWT. What is not clear is the commitment to hiring Sahtu residents and particularly Indigenous Sahtu residents. Can the GNWT please provide clear information on what their goal is for local or regional hiring?”
2. Within the contracting phase, when assessing/scoring proposals please describe the weight that the proponent will place on northern hiring. What penalties or corrective actions will be written into contracts if the proposed commitments are not met?
3. Please describe and evaluate potential effects of the project on the following, at both the general and community specific level:
 - a. Direct and indirect employment opportunities generated by the development and the potential for uptake of these opportunities by Aboriginal peoples
 - b. Employment and income opportunities for every year of construction and operation with particular reference to wage and salary employment by length and form of employment skills category
 - c. Measures, plans, and commitments for maximizing local and Aboriginal Employment.
4. For any non-governmental employers involved in this project, please indicate how GNWT will require improvements and training to correct for failing to meet hiring targets and/or other Key Performance Indicators that are developed. What actions will the proponent take when they fail to meet their targets? Please provide examples of GNWT actions to this effect in other large public works projects.
5. Please provide a discussion on how GNWT will report on their socio-economic targets and the project performance.”



Response from the Government of the Northwest Territories:

Request 1

At this time, the GNWT is not committed to specific local or regional employment targets or quotas beyond the 50% hiring target for employees within the NWT. The GNWT will consider the suggestion from the Délı̄ne Got'ı̄ne Government to assign additional specific targets for hiring Indigenous and/or Sahtu Region residents, along with community feedback provided through engagement on the proposed socio-economic mitigation measures that is currently ongoing.

Request 2

The procurement and contracting specific to the Project have not yet been established as the procurement methods for construction and various contracts needed are not yet known. Consequently, the GNWT has not developed the terms of reference for requests for proposals (RFPs) or tender documents for the Project. At the time of development, GNWT will factor in commitments made regarding northern hiring targets.

Any procurement under the Project will follow the Key Principles listed in the GNWT's Procurement Guidelines.

Requests 3a, 3b and 3c

The GNWT assessed three types of employment in relation to the proposed Project: direct, indirect and induced, which are all anticipated to result in positive effects. Direct employment refers to the jobs arising as a result of the actual construction of the Project. Indirect employment arises from the additional economic activity generated as the result of the purchase of materials and services required for Project construction (e.g., diesel or trucking services). Induced employment refers to the jobs created when the wages and salaries paid by the workers hired through direct and indirect employment-related to the Project are spent in the community, generating additional economic activity (for example in grocery stores, retail outlets, and restaurants).

At this time, construction planning has not advanced to the stage where firm employment requirements or schedules are available. Only a general timeline and total annual workforce requirement has been determined for the purpose of the environmental assessment. Therefore, more specific information on wage and salary employment by length and form of employment is not available.

As described in Sections 5.4.14 and 9.7.2.1.1 of the DAR, the estimated number of direct jobs expected to be created by the construction of the Project is approximately 200-330 full-time employees (FTEs) for each year of construction activity. These include approximately:

- 160-280 construction personnel (40-70 persons plus cross-shift at two work camps);
- 8-10 supervisors (4-5 supervisory personnel per cross-shift)



- 6 environmental / wildlife monitors (three per cross-shift)
- 24-30 camp services personnel (cooks, first aid, cleaning, and others per camp plus cross-shift)
- Construction administration and management personnel

In addition to direct construction employment, anticipated indirect jobs during the construction of the Project related to supply and resupply, waste haul, equipment and material supply, and personnel transport are also expected. The estimated number of indirect jobs is between 84 – 126 FTEs per year of construction, and the estimated number of induced jobs is between 40.5 to 60 FTEs per year of construction.

As noted in Section 9.7.2.1.1 and in Table 9.16 of the DAR, the Project is anticipated to provide an approximate total of 2,500 direct, 1,050 indirect, and 503 induced FTEs¹ over the current construction timeline of 20 years.

As identified in Section 9.7.2.1.2, only a basic estimate of direct jobs required for operations and maintenance has been developed. The GNWT estimates that there would be a total of one supervisor, three or four operators and three or four casual positions required per maintenance camp along the Project, and that there would be a total of three camps once the Project is operational. In the winter, the numbers of jobs would be reduced to one supervisor and three or four operators. This is an estimated total of 21 to 27 positions in the summer and 12 to 15 positions in the winter, for an overall total of 33 to 42 positions. These new positions may result in changes to the local employment rates in each community, but given the small number of jobs, it may not be possible to see measurable changes in employment rates due to Project-related operational jobs.

As noted in Table 9.17 of the DAR, the GNWT estimates there will be 25 direct, 7.4 indirect, and 2.9 induced FTEs associated with the maintenance of the road. Annual employment effects are estimated at 35.3 jobs and over \$2 million in salaries and wages. This may be reflected in higher family income levels in communities over a longer period, although given the relatively small number of jobs associated with Project operations, the change may not be possible to measure.

The GNWT has estimated that 50% of the construction workforce will come from the local Sahtu and Dehcho communities and from elsewhere in the NWT, with the remainder of the workforce coming from outside the NWT (as described in Section 8.2.6.1 and 9.7.2.1.1 of the DAR). At this time, more specific labour market information related to uptake of employment by Indigenous peoples is not available.

As discussed in Section 9.16 ‘Summary of Mitigations and Commitments’ of the Developer’s Assessment Report (DAR), a Community Readiness Strategy will be developed to mitigate the potential adverse socio-economic effects of the Project on the Local Assessment Area and Regional Assessment Area communities and enhance the potential positive effects. As described in section 9.16.2.2 of the DAR, the GNWT has committed to establish a Training and Employment Sub-Working Group to develop and implement a Contractor Training and Employment Plan in collaboration with communities. The

¹ FTEs are not actual jobs but equivalent to full-time jobs (including part-time jobs).



Contractor Training and Employment Plan is intended to enhance the anticipated potential positive effects and mitigate potential adverse effects associated with education, training and employment.

Request 4

The GNWT will abide by northern hiring standards on non-governmental contractors covered by the Contractor Employment and Training Plan under the Community Readiness Strategy. Any procurement under the Project will follow the Key Principles listed in the GNWT's Procurement Guidelines. As mentioned in *Request 2* above, it is currently unknown what the contracting will look like for the Project and what contractual obligations will be, and therefore the GNWT cannot comment on what specifications will be included in contracts.

Request 5

As outlined in Section 9.16.2 of the DAR, the GNWT has committed to developing a Community Readiness Strategy, which includes a Social Monitoring and Adaptive Management Sub-Working Group. This Sub-Working Group will develop and implement a Social Monitoring Plan and a Well-Being Adaptive Management Plan. The Social Monitoring and Adaptive Management Sub-Working Group will be responsible for annually monitoring changes in community well-being indicators related to Project activities and/or effects and responding with appropriate adaptive management measures. Aligned with the principles of adaptive management and community collaboration, the details that will be included in the Community Readiness Strategy and associated plans (i.e. Road Safety Plan, Safety and Security Plan for Vulnerable Community Members, Contractor Training and Employment Plan, Social Monitoring Plan, Well-Being Adaptive Management Plan) have not yet been determined. These will be developed in collaboration with communities.

In Section 9.16.2.3.2 of the DAR, the GNWT states that the Social Monitoring Plan provides the basis for the Social Monitoring and Adaptive Management Sub-Working Group and the Mackenzie Valley Highway Corridor Working Group (MVHCWG) to monitor socio-economic and well-being indicators. The Social Monitoring Plan will track the implementation of the activities identified in the Well-Being Adaptive Management Plan, the Contractor Training and Employment Plan, the Road Safety Plan and the Safety and Security Plan for Vulnerable Community Members. The Social Monitoring and Adaptive Management Sub-Working Group will consider and apply the follow-up and monitoring framework that is identified in Section 9.15. The GNWT has made the following commitments regarding the Social Monitoring Plan:

- a. The Social Monitoring Plan will include identification of appropriate well-being indicators, associated trends and thresholds for change, and measure the overall effects of the Project on community well-being.
- b. The Social Monitoring Plan will track the indicators that are identified in the Plan starting a year prior to construction, during the construction of the Project and for the first five years of operations.
- c. The Social Monitoring and Adaptive Management Sub-Working Group Working Group will review



and discuss the monitoring results on an annual basis and will provide annual reports to the communities, as well extend an invitation to meet and present directly to communities.

Broader reporting requirements for the MVH may be required as per funding agreements when received.

The GNWT has carried out engagement on the above proposed mitigations (i.e., the Community Readiness Strategy and associated Working Groups/Sub-Working Groups and Plans) and remains open to working with communities as the project advances to refine them, if needed. The proposed mitigations may complement the GNWT's existing programs and services to prepare communities to participate in economic benefits associated with the project. As required, adaptive management responses will be developed collaboratively with communities.

Communities are encouraged to participate in the upcoming engagement sessions to help the Project better understand community concerns.



TS DGG-09

Topic: Ensuring Benefits to Sahtu Residents from Project Construction - Contracting

Reviewer Preamble:

As with other areas in the DAR, assessing this Key Line of Inquiry is difficult as there is a lack of information – leaving parties to seek key details to even understand the initial commitment. Instead of analyzing a draft proposal, we are forced to seek the information just to understand the commitment and the facts around any mitigation. In this case, it does not seem that the project is intending to deploy programs to improve the probable outcomes. For DGG, failure to deliver meaningful training, employment, and/or contracting benefits as part of a generational construction program represents a significant failure.

Contracting is often the easiest aspect of Social Economic benefits to achieve (at the diamond mines, large infrastructure projects) but it requires planning and effort to ensure that the door is open enough for northern businesses who are at a competitive and scale disadvantage to southern outfits.

Reviewer Request:

- 1) Within the contracting phase, when assessing/scoring proposals please describe the weight that the proponent will place on northern based companies? Will the BIP program be applied to the evaluation process?
- 2) How will GNWT ensure that Joint Ventures meet the expectation of 'Joint' – that they are not simply shells where a southern company matches with a northern partner in name only?
- 3) How will GNWT structure contracts so that small businesses in the North can meaningfully bid and take advantage of potential opportunities? As an example of a past effort, at Giant Mine, the reclamation project heard the criticisms of its past efforts and has sought to provide breakdown packages at a variety of scales, providing a broader opportunity for northern businesses.



Response from the Government of the Northwest Territories:

1) and 3) At this time, the method(s) of procurement for the construction of the highway has not yet been determined and will depend on funding received. The Project will entail a variety of needs for the provision of goods and services at different scales and at different stages of construction. It is anticipated that there will be a variety of contract types needed to fulfil these needs. Any procurement under this Project will be in accordance with GNWT procurement legislation and policies.

The GNWT's intent is to provide opportunities for NWT businesses and contractors at all scales to participate equitably, maximizing employment, and developing capacity throughout the region. Examples of instruments that may be used to provide registered NWT businesses with the incentive to bid for work include the Business Incentive Policy (BIP) and the Northwest Territories Manufactured Products Policy (NMPP). The BIP, when used in competitive procurements, provides a bid adjustment based on the amount of local and NWT goods, services, or labour. Non-NWT businesses can get bid adjustments as well under the BIP if they are using local or NWT goods, services, or labour. The NMPP requires mandatory purchase, limited competitions, or mandated use in competitive procurements of approved NWT manufactured products. . The specific policies used would be determined on a contract-by-contract basis.

Proposed mitigation to prepare for community readiness includes establishing a Training and Employment Sub-Working Group which would develop and implement a Contractor Training and Employment Plan (Section 9.16.2.2 of the DAR). The Plan would include measures to support local hiring and businesses, and work collaboratively with communities to leverage existing programs and services to ensure that communities are prepared to take advantage of employment and business opportunities.

2) Regardless of the type of procurement model, GNWT will follow its key Procurement Principles¹ that are designed to maximize benefits to NWT businesses and residents.

¹ See Section 1.1.2 in the GNWT Procurement Guidelines: <https://www.fin.gov.nt.ca/en/resources/gnwt-procurement-guidelines>



Topic: Todd Slack DGG 10 Community Disaster Response: Forest Fire Occurrence and Evacuation Support/Planning

Reviewer Preamble from:

DGG has reviewed the GNWT response to LKFN IR 7.1 regarding forest fire occurrence. The statement that the road will not have any increase on the probability of fire occurrence seems poorly founded. Furthermore, the project is compared against two other scenarios – the current winter road and the middle/upper Dempster Highway (unclear where the southern exclusion boundary is). The winter case is straightforward – the highway will pose increased risk; while the Dempster comparison requires additional consideration. With a lack of information, DGG asserts that the middle/upper Dempster represents a different environment with much different vegetation densities and complexes than that of the Mackenzie Valley Highway project area.

From the limited information, there is an incongruity in what GNWT thinks this road will provide. In the IR response, the anticipated use of the road can largely be described as a conduit for residents – with only a small amount of road-based harvesting access recognized beyond that. However, in the DAR, increased industrial use, tourism and local use seem to be recognized as possibilities. DGG believes the latter more likely – when we develop roads in the territory, increased use follows.

When we combine the fact that the use of this area is moving from winter only (aka zero risk) to all seasons with a higher intensity, the growing risk associated after fire ignition, and the ability of the community to continuously respond to emergency matters, DGG wants to ensure that there are appropriate supports for communities forced to deal with these situations.

DGG has accepted evacuees from Yellowknife and Fort Good Hope over the last two years, seeing our community grow 25% virtually overnight. This is work we are pleased to do – looking after family, elders and our neighbours is the Dene way. However, with this project, it is important that GNWT is prepared to support us as another order of government.

Reviewer Request :

1. Will the construction of the MVH alter GNWT fire management priorities?
2. As the threat increases, in the future, how does GNWT intend to provide improved community supports during emergency circumstances?



Response from the Government of the Northwest Territories:

1. The GNWT's wildfire management priorities are guided by the Forest Fire Management Policy (GNWT 2023), which defines the GNWT's approach to wildfire prevention, mitigation and response activities across the NWT. It puts values-at-risk at the forefront of decision-making. The highest priority is given to protecting human life, and prioritizes communities, cabins, critical infrastructure and values of importance to northerners. The department maintains an expansive collection of values-at-risk in a database. It is updated regularly. The all-season MVH may result in some new values such as cabins, homes, or infrastructure in the area. The department would incorporate new values into the database for consideration by fire managers. These would then be considered as part of wildfire management decision making. For example, if new maintenance facilities were installed along the highway, those new maintenance facilities and their safety would form part of the response consideration. This would also apply to any new homes, cabins, or other structures which could come about because of the highway. There is also a role for wildfire prevention activities – including public outreach, awareness, education, and patrols -- to play in reducing wildfire risks in the area. Wildfire prevention activities are targeted to the most-used areas as these, naturally, are the most prone to human-caused fire. With greater use will come increasing targeted wildfire prevention activities to reduce the occurrence of human-caused fire. In summary, existing policies and programs are sufficiently flexible to accommodate potential evolutions in values-at-risk and wildfire prevention priorities which will come with the MVH and the department is well-positioned to deliver on shifting prevention and response priorities which may come with the MVH.
2. A lack of road access is one of the most challenging aspects of fire and emergency response in the Sahtú region, and other areas without consistent, all-season road access. The addition of the Mackenzie Valley Highway (MVH) will bolster our ability to respond to wildfires in the area by supporting movement of equipment, fuel, personnel and other key resources into and within the region. It would allow emergency management personnel within the Sahtú to consider evacuation plans that include movement by road, where previously options only included evacuation by aircraft or boats. It would allow residents the autonomy to self-evacuate by personal vehicle and potentially bring important personal items, including pets, with them. This could offer greater measures of safety to residents, more choice in evacuation locations, and possibly facilitate earlier returns in the case of evacuations – all of which would reduce the load on communities. With the MVH, the GNWT would continue to support community governments in reviewing and updating emergency plans to consider the new opportunities available for managing emergencies more effectively. During a response, where a community government and Local Emergency Management Organization's capacity is exceeded and assistance is requested, the MVH opens up options for the GNWT to support and deploy resources that may not be able to be deployed by air.

References

GNWT (Government of Northwest Territories). 2023. Forest Fire Management Policy. April 1, 2023.

Available at:

https://www.eia.gov.nt.ca/sites/eia/files/content/23.03_forest_fire_management_policy_april_1_2023_-_formerly_53.04.doc_vip_signed.pdf



Topic: Jackie Siegel DGG01 IR 10 - Financial Support for Working Groups

Preamble from the Reviewer:

“The Mackenzie Valley Highway Project - Developer's Assessment Report from October 2023 (DAR) states that “The GNWT has committed to develop and implement a Community Readiness Plan that includes several interconnected plans that are intended to address the adverse effects of the Project.” Section 9.16 provides details on the structure and function of the Community Readiness Plans, outlining the role of Sub-Working Groups (Road Safety and Security, Training and Employment, and Social Monitoring and Adaptive Management) in developing and overseeing mitigation plans for the construction and operation of the MVH.

The proposed structure engages multiple organizations and GNWT departments, over an extended period (from one year pre-construction to five years post-construction). This will require significant financial and in-kind investments from the GNWT and a considerable amount of coordination across all parties. The responsibilities of the Sub-Working Groups are likewise significant and important, and DGG is concerned that the onus to complete necessary work to identify, research, and mitigate a broad set of effects will require an appropriate investment on their behalf. The scope is significant and the community staff in place already have heavy workloads. Furthermore, given the breadth and depth of plans to be completed, MVH will wholly consume staff time, leaving existing challenges and initiatives incomplete.”

Request from Reviewer

“1) DGG is looking for additional details around the Mackenzie Valley Highway Corridor Working Group (and its component groups). For the existing proposal of the Corridor Working Group, what are the anticipated fiscal and staff resources that GNWT will provide communities to complete this work? How will the CWG and all the sub-working groups be funded, and to what amount?

2) Will Délı̄nę specifically be provided sufficient funds to participate in the sub-working groups? What staffing resources will be made available?

3) What role will Délı̄nę have on the sub-working groups? How will GNWT ensure that our participation be equitable to that of other communities?”



Response from the Government of the Northwest Territories:

Requests 1 and 2

The Government of Northwest Territories’ (GNWT’s) current fiscal and staffing commitments to the Mackenzie Valley Highway Corridor Working Group (MVHCWG) and Sub-Working Groups are outlined in Section 9.16 of the DAR. These commitments have been excerpted from the relevant sections of the DAR and are summarized in the table below. Further details on anticipated fiscal and staff resources that GNWT will provide to communities, including Délı̄ne, are not known at this time, and would be informed by future discussions with membership regarding the scope/extent of work to be undertaken by the working group and the sub-working groups. Additionally, implementation of proposed mitigations is contingent on several considerations, including:

- Mitigation discussions during the environmental assessment;
- Which mitigations are recommended by MVEIRB and ultimately accepted through the final Ministers’ decision on the Report of Environmental Assessment (REA);
- A formal GNWT decision to advance the project to construction; and
- Receipt of funding to construct the Project.

Working Group	GNWT Commitments
Mackenzie Valley Highway Corridor Working Group (Section 9.16.2)	<ul style="list-style-type: none"> • Provide base annual funding to support the work of the MVHCWG • Provide one HSS position to focus on SEIA related monitoring associated with the Project • Provide one INF position to focus on MVHCWG coordination and to chair meetings associated with the Project
Road Safety and Security Sub-Working Group (Section 9.16.2.1)	<ul style="list-style-type: none"> • The GNWT will provide funding to coordinate and handle all logistics and expenses associated with the Road Safety and Security Sub-Working Group. • The GNWT will provide financial and in-kind support to the LAA communities to develop their own Safety and Security Plans. • The GNWT will provide financial support for one part-time community-based implementation coordinator per LAA community, specifically focused on the work related to the Road Safety Plan and the Safety and Security Plan for Vulnerable Community Members. <ul style="list-style-type: none"> ○ The positions would be in place for the period of construction and five years of operations.



Working Group	GNWT Commitments
	<ul style="list-style-type: none"> ○ The positions would be responsible to act as a liaison between communities and the Sub-Working Group on issues related to the work of the committee and keep community leadership and members informed about progress.
Training and Employment Sub-Working Group (Section 9.16.2.2)	<ul style="list-style-type: none"> ● The GNWT will provide funding to coordinate and handle all logistics and expenses associated with the Training and Employment Sub-Working Group.
Social Monitoring and Adaptive Management Sub-Working Group (Section 9.16.2.3)	<ul style="list-style-type: none"> ● The GNWT will provide funding to coordinate and handle all logistics and expenses associated with the Social Monitoring and Adaptive Management Sub-Working Group. ● The GNWT will provide funding for expenses related to monitoring and public reporting and communications.

Request 3

As outlined in Section 9.16.2 of the DAR, the MVHCWG will support the development and oversight of a Community Readiness Strategy that outlines the overarching approach to enhancing benefits and minimizing adverse effects associated with the Project. The GNWT is proposing that the MVHCWG be composed of representatives from:

- Indigenous Governments (e.g., Pehdzéh Kì First Nation, Sahtu Secretariat Inc)
- Community governments
- Community organizations (e.g., Renewable Resources Councils, land corporations)
- Aurora College
- Government of Canada
- the GNWT Departments of JUS, INF, ECE, HSS, MACA, EIA, ITI and Housing NWT
- GNWT Consultants
- Construction Contractor

As outlined in the response to Requests 1 and 2 above and in Section 9.16.2, one overarching working group, the MVHCWG, and three sub-working groups will be established as part of the Community Readiness Strategy. Information on the anticipated members of the sub-working groups provided in Section 9.16.2 is summarized in the table below.

Working Group	Members
Road Safety and Security Sub-Working Group (Section 9.16.2.1)	<p>“This (Road Safety and Security) Sub-Working Group will be comprised of representatives from the GNWT Departments of INF, MACA, JUS, HSS as well as RCMP, and representatives from community governments and other affected parties (e.g., groups working with youth and women).” (page 9-285)</p>
Training and Employment Sub-Working Group (Section	<p>“The MVHCWG will collectively determine who should sit on the (Training and Employment Sub-) Working Group from the GNWT,</p>



Working Group	Members
9.16.2.2)	education and industry partners, and community leadership and organizations.” (page 9-288)
Social Monitoring and Adaptive Management Sub-Working Group (Section 9.16.2.3)	“The (Social Monitoring and Adaptive Management Sub-) working group is to be comprised of representatives of the communities and community organizations, and from the GNWT Departments of INF, ECE, HSS, MACA, JUS, Housing NWT, as well as community governments, RCMP, and relevant social and health agencies or other affected parties. Given that Project-related social and health effects may be felt in both communities local to the Project (Norman Wells, Tulita, Wrigley) and also extend to regional communities (Fort Good Hope, Colville Lake, Délı̄ne, Fort Simpson), the Working Group will include representatives from both local and regional communities.” (page 9-290)

The GNWT is committed to a participatory, collaborative, and community-driven approach to forming the MVHCWG and the Sub-Working Groups. Since community engagement sessions are ongoing, the specific details of the MVHCWG and the three Sub-Working Groups have yet to be developed. However, in proposing the Community Readiness Strategy, the GNWT recognizes the importance of the need for local peoples and local knowledge to shape the final composition and focus of the MVHCWG and each Sub-Working Group and their associated Plans. The GNWT thanks the Délı̄ne Got’ı̄ne Government for the feedback regarding the focus of the MVHCWG and Sub-Working Groups and will consider this feedback alongside other comments provided on the Community Readiness Strategy as part of community engagement.

The GNWT has carried out engagement on the proposed mitigations and remains open to working with communities as the project advances to refine them, if needed. The proposed mitigations may complement the GNWT’s existing programs and services to prepare communities to participate in economic benefits associated with the project. As required, adaptive management responses will be developed collaboratively with communities.

As outlined in the DAR, the GNWT is proposing to advance development of the Corridor Working Group one year prior to the start of construction. The purpose of this action is to ensure that communities are able to benefit from the training, employment, and business opportunities associated with the project, as well as adapt or prepare for other project impacts. The GNWT has heard a desire from communities to commence this work as soon as possible. The GNWT would like to clarify our commitment, in that we commit to establishing these working groups and related sub-committees a minimum of one year prior to construction. Specific commencement dates will be established through further discussions with communities.



Topic: Jackie Siegel DGG03 IR 11 – Food Prices in Délı̄nę (GNWT)

Preamble from the Mackenzie Valley Environmental Impact Review Board (Review Board):

“The DAR states that there will be “greater variety of groceries (easier to access groceries in other communities as well ability for greater variety of fresh foods to be provided all-season)” due to the all-season operation of the highway (section 9.5.5). The DAR also outlines measurable parameters related to food security in section 9.2.4.1, including cost of food (\$) and access to lower cost (high quality) food. As a community in the RAA, Délı̄nę is not likely to experience this benefit.

Contrary to some of the anticipated benefits for communities along the road route, DGG is concerned that landed prices in our community will be negatively affected. As Tulita and Norman Wells move to the road net, aerial freight delivery and passenger traffic levels will be significantly altered, with a potential negative economy of scale being imposed on the communities that are reliant on the air-supply net (Délı̄nę, Fort Good Hope, and Colville Lake). As a result, Délı̄nę is concerned that some of the positive themes of the project for the connected communities will be net negatives for our community – primarily cost of living.

Please note IR 11 is submitted to GNWT in conjunction with IR 12 to CIRNAC.”

Request from Reviewer

- “1) To what degree, if at all, is it expected that Délı̄nę will see a change in food prices with the operation of the MVH? How does this compare to expected changes in other Sahtu communities?
 - a. What parameters and assumptions have been made for these calculations? Please describe (and submit) the work that GNWT has done to understand the consequential impacts of the project on the cost of food for Délı̄nę and the other remote communities.
- 2) Given that DGG expects food prices to rise in Délı̄nę, has GNWT explored mitigations against this? How will GNWT ensure food prices do not rise in Délı̄nę?
- 3) What is/are the specific parameter/s that will be used to measure food cost and food access, i.e. a specific parameter available through the NWT Bureau of Statistics? DGG expects that this is going to be measured at the community level and not just at the regional level.
- 4) Please provide a discussion on the timing nature of these mitigations – Délı̄nę is interested in a responsive tool rather than something that requires years and repeated political decisions.
- 5) Please describe (and submit) the work that GNWT has done to understand the consequential impacts of the project on the cost of freight and passenger travel for Délı̄nę and the other remote communities.
- 6) If cost of living is observed to increase in the remote communities, what mitigations are GNWT willing to provide to offset the impacts of its road?”



Response from the Government of the Northwest Territories:

Request 1

As discussed in Section 9.5.5.1.2 of the Developer's Assessment Report (DAR), Délı̄nę and other Sahtu communities in the Regional Assessment Area (RAA) will not experience a change in all-season road access due to a lack of connection to the Project. The RAA communities of Délı̄nę, Fort Good Hope and Colville Lake will remain limited to winter road access while Fort Simpson (also an RAA community) already has all-season road access. In turn, there is no anticipated decrease in food prices in Délı̄nę or other RAA communities as a result of the Project.

Therefore, the assessment of potential changes in consumer food prices is limited to communities in the Local Assessment Area (LAA) that will gain all-season road access as a result of the Project. Changes to food prices were assessed using food price indices produced by the NWT Bureau of Statistics in LAA communities and other communities for similar projects in the Northwest Territories where an all-season road was constructed.

Request 2

As discussed in Section 9.16.2 of the DAR, the Government of the Northwest Territories (GNWT) will establish the Mackenzie Valley Highway Corridor Working Group (MVHCWG) to develop a Community Readiness Strategy to enhance potential benefits and minimize potential risks resulting from the Project. The Community Readiness Strategy will include a Social Monitoring and Adaptive Management Sub-Working Group that will be responsible for annually monitoring changes in socio-economic indicators related to Project activities and/or effects and responding with appropriate adaptive management measures.

Socio-economic and well-being indicators for the Project will be developed by the Social Monitoring and Adaptive Management Sub-Working Group through the creation of a Social Monitoring Plan. Indicators to be included in the Social Monitoring Plan have not been developed at this time but could include changes in food prices as part of ongoing monitoring related to Project effects.

It is important to highlight that there is a range of factors that can influence food prices in both LAA and RAA communities. As a result, GNWT cannot ensure food prices will not rise. Of particular note, community food prices in the Northwest Territories are influenced by the availability and design of the Nutrition North program. As indicated in a previous response to an Online Registry Comment, the GNWT has suggested that discussions between Health Canada (and other appropriate Government of Canada departments), GNWT and Indigenous Governments take place on issues related to the Nutrition North program and broader issues of responsibility for food security and socio-economic issues as part of the environmental assessment process. While RAA communities in the Sahtu will not be directly connected to an all-season road via the Project, and will not see their status under Nutrition North change, these broader discussions of food security issues would be relevant for RAA communities to participate in. This includes discussions and collaborative work envisioned for the MVHCWG and associated Sub-Working Groups to develop and implement the Community Readiness Strategy and associated plans.

Request 3



The inclusion and selection of indicators related to food costs will be determined by the Social Monitoring and Adaptive Management Sub-Working Group through the creation of the Social Monitoring Plan.

As stated in Part 1 of the response above, potential effects on food prices are assessed in the DAR using food price indices produced by the NWT Bureau of Statistics every 5-6 years. Additionally, the Existing Conditions Report included in Appendix 9C of the DAR utilizes data on poverty measures collected every 5 years by the NWT Bureau of Statistics to assess food security (e.g. percent of households worried about not having enough money for food). Both types of measures have also been identified as measurable parameters related to food security in Table 9.3 of the DAR.

Request 4

As outlined in the DAR, the GNWT is proposing to advance development of the Corridor Working Group one year prior to the start of construction. The purpose of this action is to ensure that communities are able to benefit from the training, employment, and business opportunities associated with the project, as well as adapt or prepare for other project impacts. The GNWT has heard a desire from communities to commence this work as soon as possible. The GNWT would like to clarify our commitment, in that we commit to establishing these working groups and related sub-committees a minimum of one year prior to construction. Specific commencement dates will be established through further discussions with communities.

Request 5

The assessment of potential socio-economic effects of the Project in the DAR does not include an economic analysis of impacts of the Project on the cost of freight and passenger travel for Délı̄nę or other remote communities that are part of the LAA or RAA.

Request 6

As discussed in Section 9.16 of the DAR, the GNWT will rely on an adaptive management approach focused on ongoing monitoring and leveraging existing programs to mitigate potential effects of the Project.

The GNWT will establish the MVHCWG to develop a Community Readiness Strategy to enhance potential benefits and minimize potential adverse effects resulting from the Project. The MVHCWG will include a Social Monitoring and Adaptive Management Sub-Working Group that will be responsible for annually monitoring changes in socio-economic indicators related to the Project activities and/or effects and responding with appropriate adaptive management measures.



Topic: Access to Traditional Foods

Reviewer Preamble:

The DAR states that “Due to their distance from the Project, it is anticipated that the RAA communities will not experience any decreased access to wildlife resources” (section 9.9.5). However, DGG is concerned about the impacts on traditional food sources, particularly caribou and fishing, with the construction and operation of the highway.

Reviewer Request:

1. What is the expected impact on caribou population and behavior along the MVH corridor, particularly in proximity to Délı̄nę? We want GNWT to consider the road itself, vehicle traffic, and the increased access for recreational hunting.
 - a. How will this affect food security in Délı̄nę, with consideration to the availability of traditional foods and the impact on nutrition for Délı̄nę residents?
2. What is the expected impact on fish populations in the Great Bear River? We want GNWT to consider the road itself and the increased access for recreational fishing and activities along the river.
 - a. How will this affect food security in Délı̄nę, with consideration to the availability of traditional foods and the impact on nutrition for Délı̄nę residents?
3. Given the stated effects on traditional foods from the project in general, and DGGs concern for our community specifically, what measurements and mitigation processes is GNWT willing to engage in to minimize any adverse impact in a manner that is proactive?
4. Given Chapter 18 of the Sahtu Dene Metis Comprehensive Land Claim Agreement and the Sahtu Harvest Study, how will GNWT measure changes in caribou and other wildlife harvest for the purposes of assessing compensation under the Land Claim?
 - a. Should caribou and other wildlife harvest drop below the minimum needs level threshold, as stated in the Land Claim and Sahtu Harvest Study, what mitigations are GNWT prepared to do to meet their legal obligations with reference to the Land Claim?



Response from the Government of the Northwest Territories:

1. The Project is expected to have residual effects on boreal caribou and moose from changes to habitat, movement, mortality risk and health. The potential for the Project to affect barren-ground caribou was evaluated in detail in the Developer's Assessment Report (Section 10.2.2.2). As noted in that section, the current annual range of barren-ground caribou does not overlap with the Caribou and Moose Local Assessment Area (LAA), so they were not considered further in the direct effects assessment. Barren-ground caribou were considered in the cumulative effects assessment (DAR Section 10.5.4) because of the potential that improved access created by the Project could result in additional harvest and an associated increase in mortality further afield.

By implementing the mitigation measures and monitoring suggested in the Wildlife Management and Monitoring Plan (WMMP), the Project is expected to have residual effects on the NT1 boreal caribou population from change to habitat, changes to movement, and changes to mortality risk that are not significant. As the Caribou and Moose Local Assessment Area (LAA) does not include Délı̄ne, the assessment did not address potential Project interactions on the caribou around Délı̄ne. Direct project-related effects are expected to be contained within the Caribou and Moose LAA (i.e., they do not extend to Délı̄ne) (Developer's Assessment Report [DAR], Section 10).

The cumulative effects assessment included consideration of disturbance to boreal caribou habitat in the Sahtu Range Region, which is larger than the Caribou and Moose LAA, and which includes Délı̄ne. Combined existing habitat disturbance and the Project, does not exceed a habitat disturbance threshold established by Environment and Climate Change Canada for a self-sustaining population (see Government of Northwest Territories' [GNWT]'s response to Mackenzie Valley Environmental Impact Review Board [MVEIRB] Information Request [IR]#52). Therefore, it is anticipated that the boreal caribou population in the Sahtu Range planning region will remain self-sustaining with increased access for recreational hunting to be managed as per the WMMP, and existing regulatory mechanisms such as harvest quotas.

- a. With the implementation of the mitigation measures and monitoring suggested in the WMMP, there is no anticipated change to the quality or quantity of boreal caribou available to the citizens of Délı̄ne based on potential project interactions as project effects are expected to be limited to the LAA.

2 and 2a.

The potential for increased fishing pressure during the open-water season is acknowledged in Section 17.5.2, and further discussed in Section 17.7.1 of the DAR. The Project may increase access for recreational fishing activities, particularly at locations where there are large-bodied fish such as Arctic grayling. The potential for increased fishing pressure is possible, but the magnitude of this change is not well known because the population numbers of large-bodied fish along the project alignment are not well known, and the amount of increased fishing pressure is also unknown. To address this uncertainty, and as stated in Section 17.9, the GNWT will work with the Sahtu Renewable Resources Board (SRRB) and other resource managers such as the Department of Fisheries and Oceans Canada (DFO) to address uncertainty regarding the potential effects of increased access created by the Project on the sustainability of large-bodied fish populations in the assessment areas. This would include monitoring of harvest that can be used to identify the need for management actions to be taken by the appropriate resource management organization. The need for such a program will be evaluated in cooperation with regulators and resource



management agencies including the GNWT, DFO and agencies such as the SRRB. Additional monitoring requirements, if needed as part of the Project's approval and permitting, will be incorporated into a project-specific fish and fish habitat monitoring plan.

For 1a and 2a with regard to food security concerns in Deline: As discussed in Section 9.5.3 of the DAR, it is anticipated that potential changes in food security as a result of decreased access to and availability of wildlife will not extend beyond the LAA communities (i.e., they do not extend to Délı̄ne).

3. Notwithstanding that the potential adverse effects of the Project with regard to changes in food security are not anticipated to extend beyond the LAA communities, the GNWT has committed to a follow-up and monitoring framework and socio-economic mitigations related to potential Project effects and outlined in Section 9.15 and 9.16 of the DAR, respectively. As outlined in section 9.15.2 specifically, the monitoring and follow-up framework for socio-economic valued components will focus on substantive and procedural aspects of the Project, which includes "Understanding changing existing conditions of socio-economic VCs in the LAA and RAA, the effectiveness of project mitigation measures, accuracy of effects prediction as documented in the DAR (both project-related effects and cumulative effects), and potential new/emerging effects of the Project that were not identified in the DAR.". Further, the framework is intended to ensure that the working groups and plans that are proposed as part of the Community Readiness Strategy "include mechanisms for adaptive management to address any adverse effects that are worse than predicted or were not predicted, as well as instances where positive effects/benefits or opportunities were not fully realized as predicted."

The GNWT has carried out engagement on the proposed mitigations and remains open to working with Indigenous Governments, Indigenous Organizations, and other affected parties as the project advances to refine them, if needed. As required, adaptive management responses will be developed collaboratively.

4. and 4a.

The draft WMMP for the Project included in DAR Volume 5, outlines proposed programs to monitor harvest of caribou and other wildlife species along the Project corridor. These include establishment of a new GNWT-ECC Renewable Resource Officer position to increase patrols and enforcement of wildlife harvest regulations along the Project, ongoing collection of the annual Resident Hunter Harvest survey program data, and working with co-management partners to explore a voluntary Indigenous harvest monitoring and reporting program for the Project. These programs will be coupled with ongoing collar-based monitoring of boreal caribou and periodic moose surveys to provide broad scale (regional) information about changes in population trend and distribution of these species. The GNWT's response to DRRC IR#4 provides further information about how the GNWT plans to evaluate relationships between changes in harvest pressure and changes in caribou and moose populations.

If a Participant of the Sahtu Dene and Métis Comprehensive Land Claim Agreement (SDMCLCA) files a claim for compensation related to wildlife harvesting pursuant to Chapter 18 of the SDMCLCA, the GNWT would review the information from the WMMP programs and any other relevant information to assess whether on a balance of probabilities the Project caused the loss or damage that is the basis for the claim for compensation. The challenges of attributing results from



monitoring programs to specific sources of change are discussed in the GNWT's response to MVEIRB IR#65.

Voluntary Indigenous harvest monitoring programs established under the WMMP would help to measure harvest levels relative to minimum needs levels identified by the Sahtu Harvest Study. The GNWT would rely on Indigenous Governments and Indigenous Organizations, including the Renewable Resources Councils, to alert them to instances when Participants under the SDMCLCA are unable to meet the minimum needs level identified by the Sahtu Harvest Study. In such cases, the GNWT would meet with the affected Indigenous Governments and Indigenous Organizations and Participants to review results of harvest and population monitoring programs under the WMMP and identify potential adaptive management measures if there is a clear causal link to the Project.



Reviewer Preamble:

There is a general lack of community data available across the NWT, for understandable reasons such as small population numbers and low incidence rates of disease and other quantifiable health measures. This nevertheless makes planning for health programs, including addressing health outcomes as a result of this project, particularly challenging at the community level. It is not enough to rely on regional data as each community has a unique context and will be impacted differently by the highway.

Reviewer Request:

DGG wants GNWT to provide more resources towards increasing the capture, analysis and sharing of health data, particularly publicly available community health profiles. Given that substance use and mental health are explicitly stated as concerns in the DAR, DGG is asking the GNWT to develop stronger measurements around these areas.

- 1) Is GNWT willing to commit to additional resources for improved monitoring and sharing of substance use and mental health data at the community level at the outset of this project?
- 2) Understanding that current practice limits the collection and sharing of such data due to privacy concerns, but given that DGG, as an indigenous government, is granted ownership of the data of its citizens and members (see OCAP: <https://fnigc.ca/ocap-training>), will GNWT commit to proactively work with communities to make localized data easily available for the purposes of monitoring and responding to effects of the highway construction and operation?
 - a. How will GNWT ensure that health data monitoring continues throughout and beyond the timeline of this project? How will GNWT ensure that communities are supported through relevant, timely, and available health data to monitor and respond to health concerns?

Response to IR [SDGG06

Request 1

At this time, the Government of the Northwest Territories (GNWT) does not plan to increase resources for monitoring substance use and mental health data at the community level at the outset of this Project beyond the current commitments to monitoring and reporting on health data. However, the GNWT has committed to the establishment of a Community Readiness Strategy (outlined in Section 9.16.2 of the Developer's Assessment Report (DAR)) that includes a monitoring component and adaptive management approach. The Community Readiness Strategy includes a Social Monitoring and Well-Being Adaptive Management Sub-Working Group (Section 9.16.2.3 of the DAR) that would be responsible to develop and implement a Social Monitoring Plan. The Social Monitoring Plan provides the basis for the Social Monitoring and Adaptive Management Sub-Working Group and the Mackenzie Valley Highway Corridor Working Group (MVHCWG) to monitor socio-economic and well-being indicators and adaptively manage



the effects of the Project. It will track the implementation of the activities identified in the Well-Being Adaptive Management Plan, the Contractor Training and Employment Plan, the Road Safety Plan and the Safety and Security Plan for Vulnerable Community Members. It will consider and apply the follow-up and monitoring framework that is described in Section 9.15 of the DAR. The Social Monitoring Plan includes the following commitments:

- a. The Social Monitoring Plan will include identification of appropriate community-level well-being indicators, associated trends and thresholds for change, and measure the overall effects of the Project on community well-being.
- b. The Social Monitoring Plan will track the indicators that are identified in the Plan starting a year prior to construction, during the construction of the Project and for the first five years of operations.
- c. The Social Monitoring and Adaptive Management Sub-Working Group will review and discuss the monitoring results on an annual basis and will provide annual reports to the communities, as well extend an invitation to meet and present the findings directly to communities.

The GNWT commits to providing annual funding to support the work of these working groups (information on funding is provided in Section 9.16 of the DAR).

Request 2

The Department of Health and Social Services, and the GNWT more broadly, regularly works with communities to share data. Regarding substance use and mental health data specifically, the GNWT recognizes the sensitivities and challenges of collecting this data as related to Indigenous communities. As such, the GNWT takes a collaborative approach to the sharing and collection of data where possible. Recently the GNWT has worked with the Délı̨ne Got'ı̨ne Government (DGG) to enable the DGG to create their own Community Health Profile. Délı̨ne's Community Health Profile includes data available on substance use and mental health, while respecting privacy legislation and legal obligations. Another example of how the GNWT shares community level data can be found in work undertaken collaboratively with the Tłı̨chı̨ Government as a result of the Tłı̨chı̨ All-Season Road environmental assessment. Through data sharing agreements and Memorandums Of Understanding (MOUs), the GNWT shares data with the Tłı̨chı̨ Government to aid in public reporting on changes in indicators relevant to the Tłı̨chı̨ Highway's impacts, and to aid in mitigation of those impacts. Similarly, the GNWT is committed to sharing data on well-being indicators identified by the Social Monitoring Plan collaboratively as part of monitoring and adaptive management for the Mackenzie Valley Highway project.

To address privacy considerations and data availability related to monitoring these parameters, the GNWT is open to exploring the development of data sharing agreements and MOUs with communities. HSS has indicated that this approach has been used with communities in the NWT for other projects or initiatives. This approach is also aligned with the GNWT's commitment to implementing the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), which reaffirms the rights of Indigenous Peoples to access and control data about their Peoples, territories, lifeways, and resources.



Request 2a

The GNWT is committed to continuing to monitor and report on health and social services data throughout and beyond the timeline of the Project. This includes annual reporting via the NWT Department of Health and Social Services Annual Report. To ensure that communities are supported, the GNWT is committed to an adaptive management approach through the Community Readiness Strategy and the associated working groups and plans, which aligns with best practices and supports communities addressing the impacts that matter to them most. Importantly, any *qualitative* methods for monitoring Project effects on human health and community wellness will be guided by the needs and direction provided through the Social Monitoring and Adaptive Management Sub-Working Group. The specifics of how parameters could be used in monitoring or reporting would require discussions with the Social Monitoring and Adaptive Management Sub-Working Group to ensure that data is being used and interpreted appropriately with regard to monitoring and mitigating potential effects of the Project. The adaptive management approach focuses on leveraging and augmenting existing services and programs is consistent with the approach taken by GNWT for similar projects. For example, an adaptive management approach was taken for the Tłı̄chǰ All-Season Road environmental assessment. That adaptive management approach focuses on implementing initiatives grounded in existing programming and approaches to respond to socio-economic conditions that were identified through collaborative monitoring activities with communities.

If additional datasets that are suitable for monitoring potential Project effects are collected in the future or become available, that information would be shared with the Social Monitoring and Adaptive Management Sub-Working Group to inform the development and implementation of monitoring and adaptive management for the Project.



Reviewer Preamble:

“Substance use is already an area of great concern for Délı̄nę without introduction of the highway. The DAR states that “Health centre staff in Délı̄nę noted that more drugs and alcohol in Tulita would result in more drugs and alcohol in Délı̄nę, due to the proximity of the communities to each other” (section 9.5.6). Changes in community/social ties and social pressures due to the construction and operation of the highway will have an adverse effect on drugs and alcohol in Délı̄nę, and DGG must be confident that sufficient resources are committed to addressing these effects.”

Reviewer Request:

“1) Can GNWT provide community level data for alcohol and drug use in Sahtu communities? How often is this data collected and released?

2) As drug and alcohol use increases in LAA communities, how will Délı̄nę be affected? Please describe (and submit) the work that GNWT has done to understand the impacts and pathways of the project on drugs and alcohol in Délı̄nę and other remote communities.

3) Can the GNWT provide data on drug and alcohol use behavior changes from the TASR and Tuktoyaktuk highway projects? As Gamèti is a similarly ‘off-road’ community, this might be a useful comparator for Délı̄nę.

a. What lessons can GNWT take from other projects that it will apply to the MVH project to mitigate increases in drug and alcohol use in LAA and RAA communities?

4) DGG believes that drug and alcohol mitigation strategies need to be comprehensive and sufficiently resourced. How much funding and staffing is currently allocated in each community for drug and alcohol prevention and addictions treatment. What mental health services are available in each community (for substance use and more)?

a. What resources and mandate will the Corridor Working Group and sub-working groups have to specifically monitor and mitigate drugs and alcohol? Will GNWT commit to responding to concerns raised by the working groups?

5) If the highway is built, what are the minimum steps necessary to provide prevention, treatment and mental health services in communities? Will GNWT commit to long-term funding of treatment programs? (Note, Community Readiness Strategy is funded until 5 years of operation).

a. How long have similar road working groups been funded to Tı̄chq?

b. Does GNWT believe this is sufficient time to measure and make changes? If so, why?

c. For these programs, what were the funding levels before and after the construction of TASR?

6) What plan does the GNWT have to address drugs and alcohol enforcement (trafficking, bootlegging) along the MVH? If this strategy is meant to be developed by the sub-working groups, does GNWT believe there is sufficient time and resources to implement this upon the opening of the highway. DGG expects this plan to include at least the GNWT, RCMP, tow truck services, and other emergency services.



7) Given responses to all the above, does GNWT believe this is sufficient to address adverse effects on drugs and alcohol from the highway?"

Response 1:

Can GNWT provide community level data for alcohol and drug use in Sahtu communities? How often is this data collected and released?

Regional level data on drug and alcohol use is available publicly through the Northwest Territories (NWT) Tobacco, Alcohol, and Drug Use Survey. This survey takes place once every five (5) years and regional data for 2018 and 2023 is published on the NWT Bureau of Statistics website (<https://www.statsnwt.ca/health/alcohol-drug-use/>).

Other indicators related to alcohol and drug use in Sahtu communities are collected at the community level by the Health and Social Services system. However, there are limitations on the public release of this community level data. There are also limits on the ability to share community-level data; care would have to be taken with respect to how it may be used for privacy and confidentiality reasons. The specifics of how indicators could be used in monitoring or reporting would require discussions with the Social Monitoring and Adaptive Management Sub-Working Group (Section 9.16.2.3), which includes members of the Government of the Northwest Territories (GNWT), to ensure that data is being used and interpreted appropriately with regard to monitoring potential effects of the Project.

The GNWT recognizes the sensitivities and challenges of collecting health data and data related to Indigenous communities. As such, the GNWT takes a collaborative approach to the sharing and collection of data where possible. For example, to address privacy considerations and data availability related to monitoring these parameters, the GNWT is open to exploring the development of data sharing agreements with communities. The Department of Health and Social Services (HSS) has indicated that this approach has been used with communities in the NWT for other projects or initiatives, and also aligns with the GNWT's commitment to implementing the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), which reaffirms the rights of Indigenous Peoples to access and control data about their Peoples, territories, lifeways, and resources.

Response 2

As drug and alcohol use increases in LAA communities, how will Déłıne be affected? Please describe (and submit) the work that GNWT has done to understand the impacts and pathways of the project on drugs and alcohol in Déłıne and other remote communities.

Overview of Work Done to Understand Project Effects and Pathways

Sections 9.1.2 and 9.1.3 of the Developer's Assessment Report (DAR) provide an overview of the methodology and approach to the assessment of potential socio-economic effects of the Project. The assessment was guided by the Terms of Reference for the Project (MVEIRB, 2015 [PR#66]). Feedback provided during the Mackenzie Valley Environmental Impact Review Board's (MVEIRB) 2013 scoping phase identified high-priority issues that are important to communities along the project alignment and are of particular interest to the MVEIRB as reflected in key lines of inquiry (KLOIs).



Subjects of Note (SONs) identified in the Terms of Reference (ToR) (Section 7.3 of the DAR) are lower-priority environmental receptors that require sufficient analysis to determine whether the Project is likely to cause significant adverse effects. Several SONs relate to changes to the socio-economic environment.

More information about the priority issues and concerns that were gathered by the MVEIRB during its scoping sessions, and which led to the identification of the KLOIs and SONs that guide the socio-economic impact assessment (SEIA) process is included in Appendix 9A of the DAR. The KLOIs were also reconfirmed through the SEIA community engagement carried out in 2022. Further information on KLOIs and SONs is provided in Chapters 1 (Introduction to the Assessment) and 4 (Assessment Approach and Methods) of the DAR.

The approach to the socio-economic impact assessment was also informed by the following MVEIRB materials:

- SEIA Guidelines, which outlines the MVEIRB's expectations for assessing socio-economic and cultural impacts, including guidelines and considerations for carrying out engagement and incorporating the key concerns and issues raised during engagement into the SEIA (MVEIRB, 2007).
- Evolving Environmental Impact Assessments in the Mackenzie Valley and Beyond Perspectives Paper, which provides guidance and information to support continuous improvement in environmental impact assessment process and ensures that well-being is considered along with significant environmental impacts as part of the assessment of the Project (MVEIRB, 2020).

Engagement with potentially affected communities and parties is a central component of SEIA and is a key component of the methodology to assess the potential effects of the Project on socio-economic VCs. Engagement with Indigenous Governments, Indigenous Organizations, community members and other affected parties to gather information on existing conditions and potential effects of the Project was conducted at several points in the development of the effects assessment. More detailed information on the engagement approach and influence of engagement are contained in Section 9.2.2 of the DAR.

A list of preliminary anticipated socio-economic VCs, indicators and the rationale for their inclusion was produced (see Table 9.1 of the DAR), based on the KLOI and SON, best practices, experience with similar projects, and review of other similar projects. The VCs identified refer to those features of the environment that may be affected by the Project and that have been identified to be of concern by MVEIRB, the proponent (the GNWT), Indigenous Governments, Indigenous Organizations, community members and other affected parties. The value of a component relates to its role in the environment (social or physical) and its scientific, social, cultural, economic, historical, archaeological, or aesthetic importance. Indicators represent more specific items that reflect the key characteristics of the VC that serve as the focus of the assessment. Additionally, the interconnectedness of land and well-being is recognized as part of the holistic approach and there are references to these other effects assessments in the more detailed effects assessments for each Socio-Economic VC in Section 9.0 of the DAR.

Potential Effects of Drug and Alcohol Access and Use in Délı̄ne

The three communities in the Local Assessment Area (LAA) (Pehdzeh Ki First Nation (Wrigley), Tulita and Norman Wells) are more likely than Regional Assessment Area (RAA) communities (Colville Lake,



Fort Good Hope, Délı̄nę and Fort Simpson) to experience direct effects of the Project on socio-economic VCs because of their proximity to construction sites and the Project itself. Although some direct effects are possible for communities in the RAA, they may be different or reduced in nature due to these communities being located farther away from the construction sites and location of the Project or already having all-season road access.

With respect to drug and alcohol use, the Project is expected to exacerbate an already serious drug and alcohol problem that exists in the LAA and RAA communities. In the community wellness plans for the LAA and RAA communities, all of them identified drug and alcohol use and misuse as a topic where programming should be directed, with Pehdzeh Ki First Nation, Fort Good Hope and Délı̄nę noting that drug and alcohol addiction is a priority health area for further action. Health centre staff in Délı̄nę noted that more drugs and alcohol in Tulita would result in more drugs and alcohol in Délı̄nę, due to the proximity of the communities to each other.

As one of the four RAA communities, it is anticipated that increased access to drugs and alcohol may also extend to Délı̄nę, even though the community it is not connected to the Project directly nor in close proximity to construction camps. RAA representatives also linked increased drug and alcohol use to other issues such as increases in crime rates (including violent crime, property crime, sexual assaults and sex trafficking), family violence, vehicle accidents, pressure on health services and decreases in family or social cohesion and personal safety.

It is difficult to determine which of the crimes for which there is community-level data may be linked to increased drug and alcohol availability but generally violent crimes as well as traffic violations were identified during engagement with community residents, health centre staff and protective services staff as being linked to drug and alcohol use.

Approach to Understanding Project Effects and Pathways

To understand the potential effects and pathways of the Project on drugs and alcohol in Délı̄nę and communities in the LAA and RAA, an existing conditions report was prepared with information from each of the communities. This entailed conducting research on the current state of drug and alcohol access and use in the communities, along with the identification of existing programs and services aimed at addressing these issues. Secondary (desktop) research entailed a review of statistical data (e.g., Statistics Canada, NWT Bureau of Statistics, RCMP crime rates, epidemiological data) and of annual reports, strategic documents, program and service descriptions, etc. Primary research entailed conducting interviews (both in-person and virtual/phone), focus groups, and community meetings, to speak with individuals such as local health and social service staff, RCMP officers, community leadership, Elders and youth to gather information on the nature and magnitude of alcohol and drug access and use in the communities. In all communities, drug and alcohol use was described as a critical problem requiring urgent attention. There was also agreement that the Project would exacerbate an already serious issue.

Response 3



Can the GNWT provide data on drug and alcohol use behavior changes from the TASR and Tuktoyaktuk highway projects? As Gamètì is a similarly 'off-road' community, this might be a useful comparator for Délı̄nę.

Gamètì or other “off-road” communities near highways might be a useful as comparator communities for Délı̄nę. However, any conclusions should be interpreted with caution. It is possible that differences in pre-existing trends or existing levels of drug and alcohol use between Délı̄nę and Gamètì (or other nearby communities) may make interpreting results from trend analysis or other statistical techniques more difficult. This is more likely in cases where trends may be difficult to interpret due to small samples sizes (which is very likely in data from small communities). Finally, as in any case when making a direct comparison between limited numbers of communities, Gamètì or other Tłı̄chų communities and Délı̄nę may have differences which are not visible in the data. Thus, the GNWT would caution against taking strong conclusions from inter-community comparisons.

While there is some data relating to drug and alcohol use in Tłı̄chų territory, attributing any changes in this use to the Tłı̄chų Highway is challenging. This includes any effects of the Tłı̄chų Highway on the people in Gamètì. The Tłı̄chų Highway was constructed between September 2019 to October 2021 and officially opened in November 2021. During that time, the Northwest Territories (NWT), along with the rest of the world, experienced the COVID-19 pandemic, which was followed in 2023 by large scale fire evacuations across the NWT. The COVID-19 pandemic and related restrictions and the Canadian Emergency Response Benefits, alongside later evacuations due to forest fires have impacted the NWT in ways which make it difficult to identify specific impacts of the Tłı̄chų Highway itself. It is thus difficult to provide meaningful data on the impact of the Tłı̄chų Highway on drug and alcohol use.

Additionally, information relevant to the Tłı̄chų Highway has been shared directly with the Tłı̄chų Government through Memoranda of Understanding and data sharing agreements and is not publicly available. As such, much of the data used as indicators of drug and alcohol use at the community and regional level, such as data collected upon entry into a Facility Based Addictions Treatment centre, cannot be shared publicly. The Tłı̄chų Government would need to be involved in any discussion on the use of Tłı̄chų community data as part of the Environmental Assessment (EA) of the Project.

Response 3a.

What lessons can GNWT take from other projects that it will apply to the MVH project to mitigate increases in drug and alcohol use in LAA and RAA communities?

Monitoring programs specific to the Tuktoyaktuk highway project ended in 2020, and research has not been conducted to see if drug and alcohol use changed in Tuktoyaktuk after the Inuvik to Tuktoyaktuk Highway opened. However, lessons learned from the Tłı̄chų Highway project were relevant when developing the overall approach to socio-economic mitigation, including monitoring and adaptive management for the MVH project as reflected in the Community Readiness Strategy (Section 9.16 of the DAR). The Strategy anticipates a collaborative approach between communities, external partners and the GNWT and is modelled after the Tłı̄chų Highway Corridor Working Group but adjusted to reflect the realities and differences of the socio-economic environment along the MVH corridor.

As more data becomes available on the impacts of the Tłı̄chų Highway, the GNWT commits to reviewing Tłı̄chų Highway monitoring report(s) and considering results, including spikes in indicators, mitigative



responses and adaptive management measures, in order to incorporate lessons learned where appropriate. These lessons learned, if available, will be incorporated into the Well-Being Adaptive Management Plan, Social Monitoring Plan, and Safety and Security Plan for Vulnerable Community Members, which will be developed in collaboration with communities as part of the Mackenzie Valley Highway Corridor Working Group (MVHCWG) and Sub-Working Groups that are part of the proposed Community Readiness Strategy. Lessons learned from the Th̄ch̄ Highway will continue to be relevant as the MVHCWG and Sub-Working Groups collaboratively develop mitigations through adaptive management prior to and for five years after construction of the road is completed. The GNWT will continue to be responsive to the needs of communities in delivering programming throughout the planning, construction and operation of the Project.

Response 4

DGG believes that drug and alcohol mitigation strategies need to be comprehensive and sufficiently resourced. How much funding and staffing is currently allocated in each community for drug and alcohol prevention and addictions treatment. What mental health services are available in each community (for substance use and more)?

At this time, there is no plan to increase services in communities as a result of the Project. The GNWT determines the level of health services in communities through the Integrated Service Delivery Model. This model helps to ensure core health services are tailored to the size and specific needs of each community and allows for flexibility. The needs of and feedback from communities help the GNWT make decisions around infrastructure investments, such as upgrading health facilities and enhancing telehealth services, and targeted recruitment efforts that focus on attracting healthcare professionals, to enhance the range and quality of healthcare services provided in a community. This model does not specifically attach funding to mitigation of the effects of projects which may impact communities, but the flexibility of the funding arrangement may allow for additional resources to be allocated if they are identified during the adaptive management process of mitigation for the Project.

The GNWT provides a number of programs and services which support drug and alcohol prevention and addictions treatment. Some examples of these programs and funding are below.

1. The NWT funds Facility Based Treatment for NWT residents. Those interested in treatment work with an NWT case manager to apply to a treatment facility in Alberta, British Columbia or Ontario. A list of available treatment facilities is available at [NWT Facility Based Treatment Options for Addictions | Health and Social Services \(gov.nt.ca\)](https://www.gov.nt.ca/en/services/health-social-services/facility-based-treatment-options). Funding for Facility Based Treatment is not connected to any specific community.
2. The Community Wellness and Addictions Recovery Fund (CWAR) ([Community Wellness and Addictions Recovery Fund | Health and Social Services \(gov.nt.ca\)](https://www.gov.nt.ca/en/services/health-social-services/community-wellness-and-addictions-recovery-fund)) provides over \$3 million dollars in funding for communities to deliver culturally relevant, community-based options addressing mental wellness and addictions recovery. It prioritizes Indigenous Governments and aims to meet the unique needs of the respective communities. The CWAR combines the former On the Land Healing Fund, Addictions Recovery Peer Support Fund, and Addiction Recovery and Aftercare Fund to prioritize Indigenous Governments and reduce the burden of compiling and completing multiple applications and reports. Regional Indigenous Governments and Community



Indigenous Governments make staffing and community level distributional decisions regarding funding from CWAR. Within the LAA and RAA of the of the Project, funding for the Community Wellness and Addictions Recovery Fund was provided to the following Regional Indigenous Governments and Community Indigenous Governments for the period of 2024 to 2025:

- Deh Cho First Nations: \$303,164
 - Sahtu Dene Council: \$303,164
 - Délı̨nę Got'ı̨nę Government: \$208,164
3. The GNWT provides mental health services across the NWT which may be considered a component of drug and alcohol prevention and addictions treatment. For instance:
- The Community Counselling Program (CCP) provides free and confidential counselling and support for mental health and substance use concerns to all people living in the NWT. These counsellors are available across all regions, with telephone counselling and fly-in service provided to all communities without a local counsellor; counselling services are primarily delivered in-person. The CCP is a key referral source for specialized services like Facility Based Addictions Treatment.
 - eMental health programs, 24/7 help lines including 811, psychiatric care and treatment, and virtual support options.

A specific list of Sahtu mental health and community wellness supports can be found here: https://www.nthssa.ca/sites/nthssa/files/resources/sahtu_mh_poster_apr2024.pdf

Funding for these programs is not attached to specific communities.

Response 4a

What resources and mandate will the Corridor Working Group and sub-working groups have to specifically monitor and mitigate drugs and alcohol? Will GNWT commit to responding to concerns raised by the working groups?

The MVHCWG and the Social Monitoring and Adaptive Management Sub-Working Group are intended to be able to respond to changes in monitored indicators and implement measures to adaptively manage Project effects identified through monitoring effects.

The responsibility for implementation of mitigation measures may be shared among various parties (e.g., GNWT departments, Indigenous organizations, Indigenous Governments, other appropriate authorities, etc.) and will depend on the outcomes of the work of the Working / Sub-Working Groups. The Monitoring and Follow-up Framework for socio-economic valued components that is described in Section 9.15 of the DAR includes elements intended to support how commitments outlined under the Community Readiness Strategy will be achieved:

“The monitoring and follow-up framework will ensure that:

1. The Working Group and three Sub-Working Groups develop and implement the five specific relevant plans described in Section 9.16.2
2. Monitoring is in place to ensure that substantive and procedural commitments are achieved:



- a. *Substantive in Support of the Plans:*
 - i. Information is available to support the development and implementation of the five plans (including the *Social Monitoring Plan* and *Well-Being Adaptive Management Plan*)
 - ii. Identification of relevant data/indicators already collected for other purposes (e.g., existing government-led, local or regional community-based monitoring)
 - iii. Identification and collection of relevant project-specific data/indicators
- b. *Substantive in Support of Understanding Potential Effects of the Project:*
 - i. Potential adverse effects, including cumulative effects, with emphasis on effects identified as significant, or that are a priority for communities
 - ii. Potential benefits/positive effects
 - iii. Identification of new/emerging effects not identified in the DAR
 - iv. Allow for attribution of effects to the Project, or proportional attribution in cases where there are multiple factors contributing to changes in the socio-economic environment
- c. *Procedural:*
 - i. The Working Group, Sub-Working Groups and five plans are developed and implemented within the identified timelines and compliant with the approaches described in Section 9.16, and the Working Group/Sub-Working Group processes (e.g., Sub-Working Groups are established, are following the guiding principles and meeting process as described in the DAR) are implemented/functional.
 - ii. Ensure that the groups/plans include mechanisms for adaptive management to address any adverse effects that are worse than predicted or were not predicted, as well as instances where positive effects/benefits or opportunities were not fully realized as predicted.”

In support of the implementation of measures that are developed as part of the Community Readiness Strategy, the GNWT has committed to providing base annual funding to support the work of the MVHCWG (DAR Section 9.16.2). This includes funding to coordinate and handle logistics and expenses associated with the MVHCWG and all sub-working groups, support for LAA communities to develop Safety and Security plans, and funding for expenses related to monitoring, public reporting and communications. The GNWT has also committed to provide one HSS position with a focus on Socio-Economic Impact Assessment related monitoring associated with the Project, and one INF position to focus on MVHCWG coordination and to chair meetings associated with the Project. Finally, the GNWT will provide financial support for one part-time community-based implementation coordinator per LAA community, specifically focused on the work related to the Road Safety Plan and the Safety and Security Plan for



Vulnerable Community Members. These funding commitments are described in Section 9.16 of the DAR. The GNWT will continue to engage with affected communities to discuss the proposed socio-economic mitigations and commitments outlined in the Community Readiness Strategy and associated Plans.

Two Sub-Working Groups and plans that are part of the Community Readiness Strategy are primarily responsible for monitoring and mitigation of the impacts of drugs and alcohol use in LAA and RAA communities. Both groups will be in operation a minimum of 1 year prior to construction, as well as 5 years after construction is complete, as described in Section 9.16 of the DAR.

1. The Road Safety and Security Sub-Working Group (Section 9.16.2.1 of the DAR) is responsible for developing the Safety and Security Plan for Vulnerable Community Members. This Plan, described in Section 9.16.2.1.2 of the DAR, is designed in part to help mitigate for the impact of drugs and alcohol. Specially the Safety and Security Plan for Vulnerable Community Members will support the implementation and coordination of health and wellness promotional campaigns which target preparedness for change, safety and security risks, and health behavior changes associated with the Project, which include promotional campaigns designed to mitigate for harms related to drugs and alcohol. The Safety and Security Plan for Vulnerable Community Members is also designed to support access to emergency shelters, transportation, education culturally-based (on the land) mental health and addictions programs.
2. The Social Monitoring Adaptive Management Sub-Working Group (Section 9.16.2.3 of the DAR) is responsible for the development of a Social Monitoring Plan and monitoring of indicators developed from the plan related to drugs and alcohol. The Social Monitoring Adaptive Management Sub-Working Group is also responsible for the development of a Well-Being Adaptive Management Plan.

The Social Monitoring Plan will include identification of appropriate well-being indicators, and monitoring trends and community conditions associated with potential effects of the Project on drug and alcohol use. The Social Monitoring and Adaptive Management Sub-Working Group will then be responsible for reviewing and discussing monitoring results on an annual basis; this will be a venue to respond to concerns raised by the Sub-Working Group.

The Well-being Adaptive Management Plan is focused on identifying actions which can be implemented at the community level in the LAA and RAA to mitigate adverse effects. As described in Section 9.16.2.3.1 of the DAR, the Plan will include a section(s) with a focus on drugs and alcohol use, including:

- Work with communities to ensure that Community Wellness Plans reflect the needs of Indigenous Governments and Indigenous Organizations. This might result in mitigations to potential adverse effects related to drugs and alcohol associated with the Project during both construction and operations, depending on community priorities.
- In response to negative changes in monitoring indicators, consider enhancements to health and wellness related programming in the area of drug and alcohol use and abuse.
- Review existing uses and demands on health and social services and identify service needs and gaps associated with drugs and alcohol.
- Support access to on-the-land treatment funding programs and facilitate promotion of other addictions treatment and aftercare options.
- Explore strategies for managing alcohol and drug use in communities through consultation with communities, RCMP and health staff.



- Ensure HSS continues to provide education and awareness campaigns on the harms of alcohol and drug use, and information for local health nurses and counsellors on treatment and awareness of substance abuse.

Response 5

If the highway is built, what are the minimum steps necessary to provide prevention, treatment and mental health services in communities? Will GNWT commit to long-term funding of treatment programs? (Note, Community Readiness Strategy is funded until 5 years of operation).

The GNWT currently provides a variety of prevention, treatment and mental health services to communities. A partial list of programs available in local communities is presented below:

- The Community Counselling Program (CCP) provides free and confidential counselling and support for mental health and substance use concerns to all people living in the Northwest Territories (NWT). These counsellors are available across all regions, with telephone counselling and fly-in service provided to all communities without a local counsellor; counselling services are primarily delivered in-person. The CCP is a key referral source for specialized services like Facility Based Addictions Treatment.
- Support for mental health includes same day / drop in and scheduled appointments for counselling, eMental health programs, 24/7 help lines including 811, psychiatric care and treatment, specialized substance use/addictions recovery treatment, community-based programming and funds, and virtual support options.
- Community Wellness and Addictions Recovery Fund (CWAR), which provides over \$3 million dollars in funding for communities to deliver culturally relevant, community-based options addressing mental wellness and addictions recovery. It prioritizes Indigenous Governments and aims to meet the unique needs of the respective communities. The CWAR combines the former On the Land Healing Fund, Addictions Recovery Peer Support Fund, and Addiction Recovery and Aftercare Fund to prioritize Indigenous Governments and reduce the burden of compiling and completing multiple application and reports.
- Community Suicide Prevention Fund, which provides \$725,000 to support community-based suicide prevention programming and support communities to develop and implement suicide prevention strategies.

Funding for these programs is not attached to any project, including highways. The GNWT continues to support the needs of communities, and this includes working with them on prevention, treatment, and mental health services. At this time, there is no plan to increase services in communities as a result of the Project.

Response 5a

How long have similar road working groups been funded to Tłı̄chǫ?



As part of Measure 5-2, in the Tłı̨chǫ All-Season Road Report of Environmental Assessment and Reasons for Decision, the GNWT alongside the Community Government of Whatı̨ and Tłı̨chǫ Government committed to monitoring and mitigating for health and well-being impacts associated with the Tłı̨chǫ Highway for a period of at least 10 years post-construction of the highway. Measure 5-2 resulted in the establishment of the Socio-Economic Working Group, which was established in 2019 and will be funded until 2032.

Response 5b

Does GNWT believe this is sufficient time to measure and make changes? If so, why?

The MVHCWG and sub-working groups are intended to be able to respond to changes in monitoring indicators and implement measures to address Project effects. The GNWT will continue to engage with communities to plan for implementation of the proposed socio-economic mitigations and commitments outlined in the Community Readiness Strategy and associated Plans.

Response 5c

For these programs, what were the funding levels before and after the construction of TASR?

Funding levels of programming are not tied to whether communities have highways. The GNWT uses the Integrated Service Delivery Model to determine funding levels for health services by community. The model considers the distinct size and consistent needs of each community, while being flexible enough to react to changes in community needs.

Response 6

What plan does the GNWT have to address drugs and alcohol enforcement (trafficking, bootlegging) along the MVH? If this strategy is meant to be developed by the sub-working groups, does GNWT believe there is sufficient time and resources to implement this upon the opening of the highway. DGG expects this plan to include at least the GNWT, RCMP, tow truck services, and other emergency services.

The GNWT has committed to establish the MVHCWG to develop and oversee a Community Readiness Strategy (Section 9.16 of the DAR). The Strategy also includes a commitment to develop a Well-Being Adaptive Management Plan that identifies additional activities and measures to be put in place as indicated by monitoring results (refer to Section 9.16.2.3 of the DAR). All plans will be developed in collaboration with communities and will build on existing programs and services that the GNWT currently offers across the NWT. One of the sections of the Plan responds to the concerns raised by communities regarding substance abuse and bootlegging that may be attributable to the Project. While the details of the Plan will be developed collaboratively with communities, the scope as outlined in Section 9.16.2.3 is envisioned to include the following activities and actions related to substance abuse and bootlegging:

- Support access to on-the-land treatment funding program and facilitate promotion of other addictions treatment and aftercare options



- It is recommended that the Nishi Program be introduced - the training through this program provides counsellors, health care workers, social workers, educators, community service agencies, government agencies, and others with tools and resources to help heal the trauma caused by addictions and abuse.
- Review existing policies on prohibition of alcohol, and through consultation with communities, RCMP and health and social services staff, explore other strategies for managing alcohol and drug use in communities
- Review the Tłchǫ Highway monitoring report(s) and consider report results, including spikes in indicators, mitigative responses and adaptive management measures, and incorporate lessons learned where appropriate
- HSS continue to provide education and awareness campaigns on the harms of alcohol and drug use, including specifically provide more information for local health nurses and counsellors on treatment and awareness of substance abuse
- The RCMP will continue to assess needs and allocate resources accordingly with any increased demands.

As outlined in the DAR, the GNWT is proposing to advance development of the Corridor Working Group one year prior to the start of construction. The purpose of this action is to ensure that communities are able to benefit from the training, employment, and business opportunities associated with the project, as well as adapt or prepare for other project impacts. The GNWT has heard a desire from communities to commence this work as soon as possible. The GNWT would like to clarify our commitment, in that we commit to establishing these working groups and related sub-committees a minimum of one year prior to construction. Specific commencement dates will be established through further discussions with communities.

Response 7

Given responses to all the above, does GNWT believe this is sufficient to address adverse effects on drugs and alcohol from the highway?"

As discussed in Section 9.5.6.3 of the DAR, the GNWT recognizes that drug and alcohol use is an existing serious issue in LAA and RAA communities that may be exacerbated by the Project. In response, mitigating potential effects associated with increases in drug and alcohol use is a focal point of both the Safety and Security Plan for Vulnerable Community Members and the Well-Being Adaptive Management Plan (discussed in detail in Sections 9.16.2.1.2 and 9.16.2.3.1 respectively). While the proposed mitigations are intended to reduce and mitigate adverse effects on social pressures stemming from a potential increase in drug and alcohol use resulting from the Project, none of these measures can completely eliminate the risk of increased access to drugs and alcohol that may arise. The effectiveness of mitigations related to the provision of health and wellness programming focused on drug and alcohol use is contingent on both the uptake and the response of individuals to programming. It is not possible to predict with certainty the degree to which mitigation measures will influence the choices that individuals might make with respect to drug and alcohol use. As a result, there may still be adverse effects on social pressures that result from the Project even with these mitigation measures in place.



As discussed in Section 9.15 and 9.16 of the DAR, the adaptive management approach proposed for the Project is rooted in the guiding principles of community readiness and preparedness, continued engagement, and collaboration. The Safety and Security Plan for Vulnerable Community Members and the Well-Being Adaptive Management Plan will be collaboratively developed by the GNWT and communities to respond to the potential significant adverse effects related to social pressures and public safety including risks to community safety for at-risk segments of the population and substance abuse. In tandem with this, the Social Monitoring Plan will identify and monitor socio-economic and well-being indicators to track the implementation of the activities identified in the Well-Being Adaptive Management Plan and the other plans that are part of the Community Readiness Strategy to ensure that mitigations are responsive to community needs and conditions.



Topic: Jackie Siegel DGG08- Health Equity across the Region

Preamble from the Reviewer:

“DGG believes there is a significant likelihood that health equity will become a greater problem than already exists if the highway is built. Health services are lacking as is, and as LAA communities benefit from improved access to services, DGG expects that Délı̄ne, as an RAA community, will not experience these benefits at the same rate or level, if at all.”

Reviewer Request:

- “1) What benefits vis-à-vis health services does GNWT expect LAA communities to experience as a result of the operation of the highway? What is the expected timeline of these benefits? For example, how long after the opening of the highway might health services be added or increased in LAA communities?
- 2) What adverse effects on health services does the GNWT expect RAA communities to experience as a result of the highway, considering factors such as reduced air traffic to the region and concentration of services in LAA communities?
- 3) Will the GNWT commit to taking a proactive approach to address any gaps in health services in RAA communities? Is the GNWT prepared to commit resources to ensure equitable health outcomes among all communities, regardless of their proximity to the highway?”



Response from the Government of the Northwest Territories:

Request 1

It is expected that there will be an improvement in overall population health (preventable and chronic diseases and mental health) because of additional ways for residents of LAA communities to seek easier and lower-cost access to non-emergency medical, dental care and social services during the Operations and Maintenance phase of the Project. Once operational, the Project would provide all-season road access for residents of Norman Wells and Tulita to health and social services located outside the LAA communities. For residents of Tulita, and Pehdzeh Ke all-season road access provided by the Project would allow for all-season access to the Norman Wells Sahtú Got'iné Regional Health and Social Services Centre or the Fort Simpson Health Centre. The Project would also allow for more affordable all-season access to health services in Yellowknife or Hay River. It is anticipated that any positive impact to health service access associated with all-season road access would be less pronounced in Pehdzeh Ke, which already has all-season road access to larger centres with a greater number of health and social services. It should also be noted that the nature of treatment required will influence where someone may seek treatment, i.e., some services or appointment types may require travel to facilities in Yellowknife, Hay River, or even out of territory.

Residents and health care staff from Norman Wells and Tulita anticipate that the positive effects of all-season road access would be more pronounced for Tulita residents, in part because of all-season access to health services, including long-term care in Norman Wells. They also commented that all-season access to Norman Wells may encourage residents to seek out preventative care more regularly (e.g., through regular screenings and check-ups) as opposed to waiting for health issues to become serious. They also noted that the ability to drive to Norman Wells and to larger centres (e.g., Hay River or Yellowknife) would allow for escorts to accompany patients to their non-emergent health, dental and social service appointments more easily than when restricted to air travel.

This increased access to health care and preventative care as a result of the Project may result in greater proportions of residents in LAA communities reporting that their self-perceived physical or mental health levels are very good or excellent.

Any changes to health services in communities are determined in part by the Government of the Northwest Territories (GNWT) through the *Integrated Service Delivery Model (ISDM)*. This model helps to ensure core health services are tailored to the size and specific needs of each community and allows for flexibility. The needs of and feedback from communities help the GNWT make decisions around infrastructure investments, such as upgrading health facilities and enhancing telehealth services, and targeted recruitment efforts that focus on attracting healthcare professionals, to enhance the range and quality of healthcare services provided in a community. The monitoring and adaptive management approach that has been committed to by the GNWT as mitigation measures of the Project will require the GNWT to collect data that will allow them to better respond to the health needs of community members through the identification of changes/improvements to targeted services and supports. This information could inform decisions and the application of the ISDM, but it should be noted that the ISDM and decisions to increase services in communities is not made as a result of infrastructure developments, but rather community needs more broadly.



It is anticipated that once the Project is operational, the identified benefits will start to occur and will continue going forward. It is not possible to predict whether and how initiatives or service changes to respond to community needs may be put in place in relation to the opening of the Project, as this depends on the assessment of community needs and the outcomes of monitoring efforts.

Request 2

The RAA communities will experience some of the same adverse effects of the Project associated with health services as the LAA communities, but the impact is expected to be less since they are not located directly on the proposed route of the Project. That being said, the operation of the Project may result in easier access to drugs and alcohol in the RAA communities in the Sahtu, as the end point of the all-season access provided by the Project will be closer to communities. This may facilitate an increase in the number of non-residents in RAA communities, resulting in increased access to drugs and alcohol. Consequently, it is anticipated that there will be an increase in demand by RAA community members for physical, mental health, substance abuse and social services and supports as a result of: increased access of drugs and alcohol and increases in crime rates, family violence, and vehicle accidents linked to drugs and alcohol (refer to Section 9.5.1 of the DAR). In addition, it is anticipated that the RCMP in the RAA communities of Fort Good Hope, Colville Lake and Délı̄ne may need to respond to increased reports of crimes during the operations and maintenance phase on account of increased access to, and consumption of, alcohol and drugs in the Sahtu Region.

Once the Project is operational, it is anticipated that there may be less reliance on air travel in the LAA communities. However, it is anticipated that given the limited nature of the health services provided in LAA communities, there will still be a need for medical travel and medevacs by air to take place, especially given the long distances to travel to larger centres that offer more extensive medical services. There is a lack of information regarding specific anticipated changes in air traffic in the RAA communities as a result of the Project. However, generally medevacs are not reliant on commercial air traffic. All communities have access to medevacs, and they occur when the situation at the health care facility exceeds their scope of practice. Medical travel occurs when a patient has a scheduled appointment outside of their current health care facility. Non-medevac medical travel to these appointments occurs via commercial air services and as indicated above, there is still anticipated to be a need for medical travel regardless of the construction and operation of the Project.

Request 3

The GNWT is committed to providing access to health services to help achieve equitable health outcomes, regardless of a community's proximity to a highway. When looking at potential adverse effects of the Project, a health equity lens was applied to determine if there were sections of the population/community which, by virtue of their circumstances, may be disadvantaged disproportionately by the Project, or would not benefit from the Project in the same way or to the same degree as other segments of the population/community.

The importance of achieving equity in health outcomes has been recognized by the GNWT HSS as part of the strategic priorities for the NWT health and social services system and includes focusing on delivery of culturally safe and relationship-based health and social services and work to reduce systemic racism through cultural safety and anti-racism training and related efforts (GNWT 2022). When working with Indigenous communities, the GNWT considers inequity related to the effect of colonialism and intergenerational trauma, including those related to residential schools.



Incorporating considerations of the effects of colonialism and systemic racism are also aligned with components of the GNWT's broader response related to implementing the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), the Truth and Reconciliation Calls to Action and efforts that the GNWT is undertaking through its Workplan to Address the Calls for Justice following the final report on the *National Inquiry into Missing and Murdered Indigenous Women and Girls* (GNWT 2021). Youth, women, and 2SLGBTQIA+ persons are often identified as vulnerable in relation to infrastructure projects like the Project, especially in remote or isolated communities and/or in Indigenous communities. The increased access of non-residents/transient workers to communities, as may occur as a result of the construction or operations of the Project, has been linked to higher rates of sexual assault/harassment, STIs and drug and alcohol use which can disproportionately affect young women and girls (Gibson 2017). When determining appropriate mitigation for adverse effects of the Project that have been identified in the socio-economic VCs and the need for monitoring, health equity considerations have been considered as part of that process.

There are ongoing initiatives that help to address community priorities, and the feedback reported in the *What We Heard: Mackenzie Valley Highway Engagement from September 2023* (GNWT 2023). There have been community concerns over equitable access to healthcare, and the influence of external factors such as easier access to cheaper alcohol and drugs in the communities. The GNWT is taking a proactive approach to meet community needs and address their priorities through targeted infrastructure investments, such as the Tulita Health and Social Services Centre, strategic recruitment efforts, and the use of integrated care teams, including paramedics.

The GNWT is also actively monitoring the entry of illicit drugs into the NWT and has been involved in a community-based harm reduction approach to manage this concern. Efforts include:

- Training for key individuals and businesses in the communities on how to use Naloxone kits, which are vital in responding to opioid overdoses.
- Presentations by the Office of the Chief Public Health Officer on substance use, as well as drug awareness meetings, such as the one held in Tulita with estimated attendance of 20 people, to educate communities on the dangers of substance abuse.
- Ongoing addiction clinics are offered, with referrals made to treatment. Attending summits, such as the Sahtu Addictions Summit hosted by Fort Good Hope, to collaborate on addressing substance use issues and provided training on the use of a naloxone kit.
- Northwest Territories Health and Social Services Authority (NTHSSA) Sahtu Region's participation in "Think Tank" meetings with Sahtu community leadership and other agencies like the RCMP to discuss challenges, barriers, and strategies around mental health and healthcare.
- NTHSSA staff attended public meetings in the Town of Norman Wells to help brainstorm ways to reduce the amount of drugs entering communities.

These are all examples of how the GNWT takes a proactive and a responsive approach to addressing gaps in communities throughout the NWT.

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