



November 15, 2011

Ryan Barry
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Dear Mr. Barry,

This letter is intended to raise an issue of great concern to our members at Pauktuutit Inuit Women of Canada (Pauktuutit) regarding the impacts of resource extraction activities on Inuit women as well as the lack of a culturally relevant gender-based analysis (GBA) during the assessment of resource extraction proposals. Pauktuutit is the national non-profit organization representing all Inuit women in Canada. Its mandate is to foster a greater awareness of the needs of Inuit women, and to encourage their participation in community, regional and national concerns in relation to social, cultural and economic development (www.pauktuutit.ca).

It has been brought to our attention that the review process for resource extraction companies' proposals (such as Areva's 'Kiggavik' uranium mining proposal) do not include a culturally relevant gender-based analysis in their Environmental Impact Statement (EIS) guidelines. Women often experience specific physical health, environmental and social impacts caused by resource extraction activities in ways that differ from the experience of men, due to the multiple roles and relationships that exist within communities.ⁱ For example, due to socio-economic circumstances caused by rapid industrialization, mining projects may make young women vulnerable to sexual exploitation. The stress mental health disorders associated with mine work can result in increased rates of substance abuse and related increases in rates of domestic violence and marital breakdown.ⁱⁱ The long absences from home due to rotational work schedules may also place increased strain on relationships and contribute to marital breakdown.ⁱⁱⁱ Additionally, concerns exist that the increased number of transient labourers that extractive projects bring to communities may have negative impacts on women's sexual health.

Women also often experience the benefits of mining projects differently than men. Employment in mines is generally male-dominated, and the women who are employed generally occupy lower-paid positions. Women also often experience

difficulties attaining lasting, full-time employment due to inadequate childcare facilities for rotational work schedules and barriers created by gender discrimination in training programs and sexual harassment on the job site.^{iv} However, when considering how women experience the benefits of increased employment we must remember that women play multiple roles in communities and families. Many Inuit families in the North continue to rely on a “mixed” economy (a mixture of economic inputs, including harvesting, household clothing production, simple commodity production and wage labour)^v. Accordingly, women may experience economic benefits from their male relatives attaining work in the mining sector, as this may provide them with resources for other economic endeavors they partake in, such as hunting, sewing, fur production or educational pursuits that may open the door to new employment opportunities. However, mining projects are also associated with the breakdown of the social relations underlying the mixed economy, as well as the cultural forms that support these social relations^{vi}. The issue of how women will experience the benefits and negative impacts of a mining project is clearly quite complex and difficult to predict without extensive research at the community level.

Accordingly, there is a need for a more comprehensive socio-economic and health analysis that includes an assessment of the potential impacts, both positive and negative, that resource extraction activities may have specifically on Inuit women. These issues can begin to be addressed by including a culturally relevant gender-based component in EIS guidelines. For clarification, when we refer to a gender-based analysis, we are referring research and reports that use

...gender as an organizing category. It addresses the similarities and differences that exist between women and men and girls and boys due to the social context. It refers to social roles, behaviours, activities and attributes as well as the complex, interpersonal interactions and relationships between individuals and groups of individuals.^{vii}

For a gender-based analysis to be culturally relevant, it must adopt “a lens characteristic of mainstream gender-based analysis”. However, it must also take into consideration the social and cultural realities of life in Northern communities, including those caused by rapid industrialization. This necessitates attention to the multiple roles women play in contemporary community life.^{viii} Pauktuutit has done the initial development of an Inuit-specific culturally relevant GBA in relation to proposed revisions to the food mail program. This framework would be a useful starting point for discussions related to mining and extractive resources in the North.

The Nunavut Impact Review Board’s (NIRB) guidelines for Areva’s Environmental Impact Statement (EIS) of its proposed Kiggavik uranium mine^{ix} contain sections that engage with many of these important issues. We are pleased that the guidelines require discussion of potential impacts on sexual health, family stability, community social structures, substance abuse and domestic violence. Likewise, we are pleased that the NIRB has included the necessity of disaggregating demographic data based on gender and the inclusion of gender equity in Areva’s human resources plan. However, there is no requirement for these issues to be addressed in a comprehensive and culturally relevant gender-based analysis. Furthermore, the NIRB is not requiring Areva to explore how this project may impact women in different socio-

economic situations (single mothers, widows, wives of harvesters, female Elders, teenage women, etc.). The inclusion of a section that deals specifically with impacts, both positive and negative, on women would help address these issues and would provide a greater voice for Inuit women's concerns during the review of the project.

In addition to including a section that deals specifically with impacts on women, the inclusion of a gender component in Inuit Qaujimaqatunangit and Inuit Qaujimaningit (Inuit knowledge) studies would help address gender issues in Areva's EIS. Recent literature on both climate change and resource extraction reveals that Aboriginal women and men often possess knowledge that is overlapping but not identical. While it is more common for men to be active hunters, many women are also hunters and many others accompany their husbands during long trips on the land. Accordingly, many women possess a great deal of knowledge about the environment and land use. Furthermore, the fact that women tend to play a dominant role in the processing of animal products (food and skins) provides them with unique insights into changes in animal morphology and physiology.^x Aboriginal women also often possess unique knowledge of social relations and occupy roles that carry a great deal of responsibility for the short and long term health of families and communities.^{xi}

While we are pleased that the NIRB requires Areva to state whether or not attempts were made to seek Inuit knowledge from women, we feel that these studies may be more useful if the proponent was required address gender issues in Inuit knowledge in a more comprehensive manner. This could include an analysis of the ways in which men's and women's knowledges differ. Doing so would ensure that the unique perspective of Inuit women will not be "swallowed up" in a broad analysis that focuses only on the points of convergence between men's and women's knowledge.

We are deeply concerned about the lack of a culturally relevant gender-based analysis in NIRB's guidelines for Areva's EIS. Despite the fact that concerns were raised in the March 2011 guidelines workshop in Baker Lake, no corresponding revisions were reflected in the final guidelines. The impacts this project may have on Inuit women are not receiving as much attention as they should during this review process and this is of great concern. Women in Baker Lake must be consulted to see how they feel about mining activities near their communities and what protective measures they feel need to be implemented, to ensure that their perspectives are given weight in the rest of the review process.

In light of the increased interest in the development of resource extraction activities in the North (such as Areva's Kiggavik project and the ArcelorMittal's Mary River project), Pauktuutit would like to open a dialogue with the NIRB and resource extraction companies to find ways we can work together in order to prevent or mitigate the potential negative impacts resource extraction activities may have on Inuit women. While the mining, oil and gas industries may provide substantial economic opportunities for northern communities, governments and Aboriginal peoples, these need to be carefully managed in order to maximize their positive effects and minimize any associated disruption. The human and social costs associated with these activities should not be ignored. Inuit women and Pauktuutit should be involved during the impact assessment regulatory process.

We are aware that the NIRB has recently finalized the EIS guidelines for the Kiggavik project and that the assessment process is moving along quite quickly; however, women's issues are not being attended to, as they should be, during this process. Therefore, we would very much appreciate an opportunity to discuss with you how we can achieve a collaborative relationship aimed at mitigating and preventing the potential negative impacts of resource extraction activities on Inuit women and their families, both specific to the Kiggavik project and more generally. Furthermore, while they are not required to do so in the guidelines, we hope that Areva may choose to engage with some of the issues we have raised in this letter and adopt some of the suggestions we have provided. We hope that you will forward this letter to the distribution list for the Kiggavik review to allow Areva and the various intervenor groups and interested parties the opportunity to consider these important issues.

We strongly believe that we should be consulted in any assessment, approval, or regulatory process as the national organization that represents Inuit women in Canada. Your help would be greatly appreciated. If you require further information, please do not hesitate to contact me at (613) 238-3977 or tohearn@pauktuutit.ca.

Kind regards,



Elisapee Sheutiapik
President

cc: Barry McCallum, Manager, AREVA Nunavut Affairs Office
cc: Tracy O'Hearn, Executive Director, Pauktuutit Inuit Women of Canada
cc: Lucille Villaseñor-Caron, Special Projects Manager, Pauktuutit Inuit Women of Canada

Endnotes:

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- ⁱ National Aboriginal Health Organization (2008); Archibald and Crnkovich (1999)
ⁱⁱ National Aboriginal Health Organization (2008); Gibson and Klinck (2006)
ⁱⁱⁱ National Aboriginal Health Organization (2008); Status of Women Council of the NWT (1999)
^{iv} National Aboriginal Health Organization (2008); Status of Women Council of the NWT (1999); Mercier (2011)
^v Abele (2009); Royal Commission on Aboriginal Peoples (1996)
^{vi} National Aboriginal Health Organization (2008a)
^{vii} National Aboriginal Health Organization (2008)
^{viii} National Aboriginal Health Organization (2008)
^{ix} *Guidelines for the Preparation of an Environmental Impact Statement for Areva Resources Canada Inc.'s 'Kiggavik' Project* (NIRB File No. 09MN003)
^x Dowsley et al. (2010)
^{xi} Dowsley et al. (2010); National Aboriginal Health Organization (2008); Kafarowski (2005)

References:

- Abele. (2009). *The State and the Northern Social Economy: Research Prospects*. The Northern Review. 30(1):37-56
- Archibald & Crnkovich. (1999). *If Gender Mattered: A Case Study of Inuit Women, Land Claims and the Voisey's Bay Project*. Ottawa: Status of Women Canada
- Dowsley, Gearhead, Johnson & Inksetter. (2010). *Should we turn the tent? Inuit women and climate change*. Etudes/Inuit/Studies. 34(1):151-165
- Kafarowski. (2005). "Everyone Should Have a Voice, Everyone's Equal": *Gender, Decision-Making and Environmental Policy in the Canadian Arctic*. Canadian Woman's Studies. 24(4):12-17
- Gibson & Klinck. (2005). *Canada's Resilient North: the impact of mining on Aboriginal communities*. Pimatisiwin. 3(1):116-139.
- Mercier. (2011). "Bordering on Equality: Women Miners in North America". In Lahiri-Dutt (ed.) Gendering the Field: Towards Sustainable Livelihoods for Mining Communities. Canberra: ANU E Press
- National Aboriginal Health Organization. (2008). *Resource Extraction and Aboriginal Communities in Northern Canada: Gender Considerations*. Ottawa: Author
- National Aboriginal Health Organization. (2008a). *Resource Extraction and Aboriginal Communities in Northern Canada: Cultural Considerations*. Ottawa: Author
- Royal Commission on Aboriginal Peoples (RCAP). (1996). *Report of the Royal Commission on Aboriginal Peoples*. Vol. 4. Ottawa: Indian and Northern Affairs Canada
- Status of Women Council of the NWT. (1999). *Review of Diavik Diamonds Project. Socioeconomic Environmental Effects Report: Impacts on Women and Families*. Yellowknife, NT