

Federal Authority Advice Record (FAAR)**FAAR Response must be submitted by February 27, 2026**

Baptiste Nickel Project – FPX Nickel Corp. (proponent)

Registry File: 90051

Department/Agency	Women and Gender Equality Canada
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1. Will your department or agency exercise a **power, perform a duty or function**, or provide **financial assistance**, related to the project to enable it to be carried out in whole or in part?
As relevant,
 - a) Specify the power, duty or function, or financial assistance, and the likelihood that it will be required to construct the project, based on the Initial Project Description, as either Required, Potential, Likely, Unlikely or Not Required – **Not Required**
 - b) Describe any associated Indigenous or public consultation, including timelines – **N/A**
 - c) Describe any associated information requirements (e.g., alternative means assessment, habitat offsetting), and specify those that may be coordinated with the impact assessment process, if an impact assessment is required – **N/A**
 - d) Identify any associated project-specific guidance or issues of which the proponent should be aware, or information the proponent should provide. – **N/A**
 - e) Indicate whether your department or agency has identified any power that it will not be exercising or may not be able to exercise to allow the project to be carried out, in whole or in part. – **N/A**

2. **Using Table 1**, identify project- and context- specific **key issues**, based on the expertise within your mandate¹ and the information in your possession, including the Initial Project Description, any exchanges with the proponent or others related to the project and known means to address the effects of the project. For each key issue:
 - a) Specify the key issue (e.g., specific species and location)
 - b) Specify the project component or activity linked to the key issue
 - c) Explain why it's a key issue based on:
 - i. biophysical effect pathway(s) from the specific project component or activity
 - ii. concern unique to the project or a priority within your mandate
 - iii. the issue being material² to decision making under the *Impact Assessment Act*
 - d) Identify how the issue could be resolved, including through means other than an impact assessment
 - e) Identify additional information the proponent could provide including to give confidence on how the issue can be addressed through other means.

Women and Gender Equality Canada (February 26, 2026)

Name and Title of Departmental / Agency Responder

¹ Refer to the [Memoranda of Understanding with IAAC](#).

² An issue is material to decision making if its analysis is anticipated to affect the conclusions on (1) whether adverse effects within federal jurisdiction or direct and incidental adverse effects (collectively adverse federal effects) are likely not significant, or of low, medium or high significance; (2) appropriate mitigation measures for significant adverse federal effects; or (3) justification in the public interest

Table 1: Key Issues to inform the impact assessment process

This table should outline key issues to inform the impact assessment process, including whether an impact assessment is required and, if so, the scope of the assessment and tailoring of the Tailored Impact Statement Guidelines/Application Information Requirements in a substituted assessment.

Key issues are the major concerns directly related to a project component or activity, the analysis of which is anticipated to be material to decision-making under the *Impact Assessment Act*.

Federal authorities' advice should be guided by the identification and resolution of key issues. If an impact assessment is required, it will be focused on key issues.

Comment ID	a) Key issue	b) Project component or activity	c)(i) Biophysical effect pathway(s)	c)(ii) Concern unique to the project or a priority within your mandate	c)(iii) Material to federal decision-making	d) Means for issue resolution	e) Additional information from the proponent
<p>Identify comments by organization and comment number.</p> <p>e.g.: IAAC-01</p>	<p>Specify the key issue (e.g., specific species and location).</p>	<p>Identify the project component or activity linked to the key issue.</p> <p>Be specific about the nature, scale, novelty and complexity or the component or activity.</p>	<p>Identify the specific biophysical effect pathway between the project component or activity and the affected environmental or human receptor (including Indigenous Peoples).</p>	<p>Describe why it's a key issue within the mandate of your department or agency, including in terms of priorities of the federal government and in terms of anticipated likelihood, severity or uncertainty of effects.</p> <p>Identify if the key issue is common for projects of this nature or in this sector, or whether it's unique to this project due to its complexity, size or novelty; a sensitive or rare receiving environment; and/or proximity of sensitive environmental or human receptors (including Indigenous Peoples).</p>	<p>Describe why the key issue is material to decision-making as either:</p> <ul style="list-style-type: none"> • an adverse effect within federal jurisdiction, or a direct or incidental adverse effect, that may be significant based on available evidence including: <ul style="list-style-type: none"> ○ federal experts' knowledge and experience with past project assessments; ○ presence of sensitive species, habitats or human receptors (including Indigenous Peoples); ○ novel or complex project activities, components or technologies; ○ high uncertainties in effects or in the effectiveness of mitigation measures; ○ unknown or unproven mitigation; or • a factor for the justification in the public interest anticipated to be material to decision-making such as a likely positive effect contributing to sustainability, to Canada's environmental obligations or climate change commitments or in supporting governmental priorities, such as reconciliation with Indigenous Peoples. 	<p>Describe how the key issue could be resolved or addressed by:</p> <ul style="list-style-type: none"> • Any means, including powers, duties, functions, frameworks, policies or guidance that your department or agency has; • Any means, including powers, duties, functions, frameworks, policies or guidance from another jurisdiction, including the province; • Common, proven, well-understood or standard mitigation measures to mitigate the effect or effect pathway(s); or • Commitments made by the proponent (e.g., in the Initial Project Description). 	<p>Describe information the proponent can provide, or commitments the proponent can make, in their Response to the Summary of Issues that would provide confidence that the issue can be resolved by existing means.</p> <p>Consider whether information, studies, analyses or collaborative work with other authorities would be required to address the issue beyond existing means.</p>
<p>WAGE-01</p>	<p>4.4 Project Workforce</p>	<p>Project Workforce</p>	<p>N/A</p>	<p>Social and economic conditions and disaggregated data related to Indigenous population</p>	<p>The key issue is material to decision making as a direct or incidental adverse effect that may be significant, because Section 4.4 Project Workforce does not discuss detailed plans to hire from the local community during the Construction Phase, Operations Phases 1 and 2, and closure.</p> <p>According to Table 4.4.1 Project Employment by Department and Phase (pg. 4-20), a total of 1,430 fulltime jobs will be hired on the Project Site during the Construction</p>	<p>Table 8.1-1 Municipal Descriptions (pg. 8-1 – 8-3) and Table 8.1-2 Key First Nation Community Descriptions (pg. 8-4 – 8-5) include disaggregated data of the local population including Indigenous communities. However, this data is not used to develop strategic project workforce in Section 4.4 Project Workforce.</p>	

					Phase, followed by 595 fulltime jobs for Operations Phase 1, 939 fulltime jobs for Operations Phase 2, and 300 fulltime jobs for Closure. However, the IPD does not provide detailed information on the number or percentage of the workforce that will be hired from the local Indigenous community to ensure maximization of meaningful local employment at the project site – a priority identified during local Indigenous engagement.	WAGE recommends that the Proponent incorporates the collected disaggregated data and engagement discussions to develop a staffing strategy that will ensure maximization of meaningful local employment at the project site. Identifying potential and interested local workforce will be key to the development of substantial and lasting opportunities for the local Indigenous communities provided by the Project over its 28-year Operations lifecycle.	
WAGE-02	4.4 Workforce 4.4.1 Accommodations	Human Health and GBV	N/A	Inclusion of mitigation measures for gender-based violence (GBV) risks	<p>The key issue is material to decision-making as a direct or incidental adverse effect that may be significant, because Section 4.4 Project Workforce and Section 4.4.1 Accommodations do not discuss mitigation measures to prevent GBV risks on the Project site and workers' accommodations.</p> <p>Section 4.4.1 Accommodation states that the Project will require approximately 1,500 beds in an Accommodation Facility to support construction, followed by 500 beds during the Operations Phase, and 750 beds during the construction of the Phase 2 expansion. According to Table 4.2-1 Major Component Sitting Flexibility (pg 4-16), workers will work 12-hour shifts per day, on a 4-week in, 2-week out rotation during the construction phase. During operations, shifts are assumed to be two 12-hour shifts per day, but with a wider range of rotation schedules.</p> <p>While the number of transient workers is yet to be confirmed, Section 4.1.6 Roads (pg. 4-12 – 4-14) and the number of beds at the workers' accommodation in Section 4.4.1 Accommodation also hint at influx of transient workers during the construction and operations phases of the Project. Section 4.1.6 Roads describes project-related traffic increases on Highway 27 (5.92% increase during construction phase; 3-6% increase</p>	<p>Given the influx of transient workers during the construction phase and operations phases, the Project site's close proximity to First Nations reserves, and the Indigenous communities' economic interests in the Project, WAGE recommends that the Proponent includes strong and clear preliminary mitigation measures for GBV risks at the workers' accommodation and on the worksite. These will likely to be evergreen as the project continues through its lifecycle, but it is important to strategize and prepare early. Monitoring is also essential to assess if the mitigation measures are having an impact on the local Indigenous population.</p> <p>WAGE recommends that the Proponent considers strict enforcement of Code of Ethics, Respectful Workplace, and Drug and Alcohol Policies, to establish clear expectations for ethical behaviour, and to maintaining open dialogue and regular communication, including robust workplace education and sensitivity training. Enforcement</p>	<p>About gender-based violence - Canada.ca</p> <p>National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019</p> <p>Strengthening health sector response to gender-based violence in humanitarian emergencies</p> <p>Fireweed Safe Haven in Fort St. James, BC</p> <p>Social Service Providers Fort St James District – historic and resourceful!</p>

					<p>during operations phases) and Highway 16 (4.76% increase during construction phase).</p> <p>Table 11-2 Potential Project Effects and Management Approach (pg. 11-5) acknowledges “changes in risk of sexual and gender-base violence” and identifies GBV risks as a concern for community well-being. While the same table includes Example Management Approach – such as application of GBA Plus and implementation of anti-violence, cultural awareness, and sensitivity training for the workforce – detailed mitigation measures are absent in Sections 4.4 Workforce and 4.4.1 Accommodation.</p>	<p>must include real consequences for harassing or violent behaviour.</p> <p>WAGE also recommends that the Proponent includes baseline study on the existing local resources for those suffering from GBV and include these in Section 8.6 Health and Community Services.</p>	<p>Community Women's Initiative Northern BC Resources</p>
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Please insert additional rows as necessary.