



Muskrat Falls Projects

Gender Equity and Diversity
Program

July 2014



1.	INTRODUCTION	1
2.	GENDER EQUITY & DIVERSITY PROGRAM STRUCTURE	2
3.	REGULATORY AND CONTRACTUAL REQUIREMENTS.....	4
3.1.	Provincial Requirements.....	4
3.2.	Lower Churchill Impacts and Benefits Agreement	4
3.3.	Applicability of the Program to Project Construction Activities.....	4
3.4.	Hiring Priority	5
3.5.	Benefits Strategy Gender and Diversity Requirements	5
3.6.	Collective Agreements	7
4.	CORPORATE AND PROJECT POLICIES AND REQUIREMENTS	8
4.1.	Application of Corporate Policies	8
4.2.	Nalcor’s Core Values	8
4.3.	Nalcor’s Diversity and Inclusion Strategy	8
4.4.	Code of Conduct and Business Ethics Handbook	9
4.5.	Nalcor’s Position on Respectful Workplace Policy	10
4.6.	LCP Workplace Policy and Respectful Workplace Standard.....	10
5.	GENDER EQUITY AND DIVERSITY INPUT AND STRATEGIC CONSIDERATIONS	11
5.1.	Stakeholder Perspectives and Contributions.....	11
5.2.	Unique Project Considerations	11
5.3.	Evaluation of Best Practices.....	12
6.	PROGRAM GOALS, OBJECTIVES, INITIATIVES AND TARGETS.....	13
6.1.	Goals and Objectives.....	13
6.2.	Employment Strategy Initiatives.....	13
6.2.1.	Capacity Building.....	13
6.2.2.	Recruitment and Hiring Processes.....	17
6.2.3.	Workplace Policies and Working Conditions	22
6.2.4.	Continuous Improvement and Adaptive Management.....	26
6.3.	Employment Targets.....	29
6.3.1.	Project Participation	29
6.4.	Business Access Strategy Initiatives.....	31
6.4.1.	Build Awareness of Project Opportunities	31
6.4.2.	Ensure Understanding of the Projects’ Procurement Requirements.....	34
6.4.3.	Business Access Targets	36

6.5.	Innu Initiatives	37
6.6.	Program Implementation	41
6.7.	Role of Contractors	41
6.8.	Role of Unions.....	42
7.	LCP WORKPLACE POLICY.....	43
8.	MONITORING & REPORTING	44
9.	CONCLUSION.....	45
Appendix A		
Gender Equity and Diversity Clauses from Collective Agreements.....		46
Appendix B		
Gender Equity & Diversity Program 2012 Consultation Report.....		53
Appendix C		
Relevant Resources		65
Appendix D		
LCP Site Handbook		69

1. INTRODUCTION

The development of Muskrat Falls¹ on the lower Churchill River in Labrador will provide a clean, renewable source of electricity to meet Newfoundland and Labrador's growing energy demands. Its development will provide homes and businesses with stable electricity rates well into the future, and will be a valuable power-producing asset for more than 100 years.

The development of Muskrat Falls represents the first phase of development on the lower Churchill River. The development includes:

- *Muskrat Falls Generating Facility*, an 824 megawatt (MW) hydroelectric generating facility consisting of two dams and a powerhouse at Muskrat Falls in Labrador.
- *Labrador-Island Transmission Link*, an 1,100 km High Voltage direct current (HVdc) transmission line from Muskrat Falls to Soldiers Pond on the Avalon Peninsula, including a 35 km subsea cable across the Strait of Belle Isle.
- *Labrador Transmission Assets*, two 250 km High Voltage alternating current (HVac) transmission lines between Muskrat Falls and Churchill Falls.

These are collectively referred to as the Projects.

The Government of Newfoundland and Labrador sanctioned the development of Muskrat Falls in December 2012. Construction is expected to take five years to complete.

The Lower Churchill Management Corporation (LCP) was established to manage the construction of the Projects as described above; LCP commits to apply the principles established in this Program throughout construction of the Projects.

¹ See more at: <http://muskratfalls.nalcorenergy.com/project-overview/>

2. GENDER EQUITY & DIVERSITY PROGRAM STRUCTURE

This document describes LCP's plan to integrate gender equity and diversity principles, values and practices in the Projects. The document presents:

- The provincial regulatory requirements and contract terms outlined in the Lower Churchill Projects Benefits Strategy (Benefits Strategy), the Lower Churchill Innu Impacts and Benefits Agreement (IBA) with the Innu Nation, and collective agreements.
- Nalcor Energy's vision and values with respect to gender equity and diversity, which apply to all of its subsidiaries, including LCP.
- Nalcor's experience with gender equity and diversity (GED) initiatives.
- LCP's goals and objectives for the LCP Gender Equity and Diversity Program (Program).
- LCP's implementation and evaluation methodology.

The Program reflects the requirements of the Government of Newfoundland and Labrador (the Province) and the terms of the negotiated benefits agreements, IBA and collective agreements. Further, it builds on and extends Nalcor's experience as an employer committed to gender equity and diversity in the workplace.

It is LCP's goal that Muskrat Falls will be a model project demonstrating innovation and creativity in developing and implementing best practices in gender equity and diversity. Through its own diversity program and through its management of the hydroelectric Projects in its mandate, Nalcor seeks to position positively the creation and ongoing support of a respectful, inclusive and diverse work culture as a desirable business practice. LCP believes the Program will also contribute to workplace safety through increased collaboration and respect, which is a priority for Nalcor and one of its corporate goals.

The Program is guided by the commitment to support employment opportunities for Labrador and for Newfoundland residents as per the Benefits Strategy.

LCP recognizes the lives of women and members of underrepresented groups are different from those who have primarily participated in large-scale industrial development; it also recognizes equal opportunity has not necessarily translated into equitable levels of participation. Thus, the Program includes employment plans and business access strategies for women, Aboriginal people, visible minorities, and persons with disabilities. As initiatives and accompanying tactics for women and diversity groups are often similar, the Program combines both to avoid duplication. The Program does, however, reflect particular considerations for specific populations as necessary and appropriate.

The Program informs all contracts, purchasing and employment agreements managed by LCP. All contractors and subcontractors are required to support this Program as per the nature of their work associated with the Projects. This Program applies to all LCP facilities, sites and offices within the province.

Oversight of the Program's implementation is provided through LCP's Executive Committee.

LCP's Gender Equity and Diversity Coordinator is responsible for the management and implementation of the Program, and is assisted by the GED Working Group, to advance the following objectives:

- Build partnerships with labour, education, government, and communities of interest (women, Aboriginal people, people with disabilities, and visible minorities) and their representative organizations;
- Facilitate awareness and understanding of GED among LCP employees, workers, contractors, unions and partners; and
- Monitor implementation of GED initiatives to assess outcomes.

LCP, its contractors and unions will work together with government and stakeholders to implement this Program and to achieve its objectives and goals. LCP is committed to continuous improvement and will review and monitor these plans and strategies throughout the construction period of the Projects to ensure the Program's success.

3. REGULATORY AND CONTRACTUAL REQUIREMENTS

3.1. Provincial Requirements

In its 2007 Energy Plan, Focusing our Energy, the Government of Newfoundland and Labrador stated:

“An available and a diverse workforce is critical to the success of our energy Projects and the growth of the provincial energy economy.”

LCP is committed to the principles outlined in the Energy Plan with respect to the construction of the Projects.

In keeping with these principles, the Benefits Strategy has been established with the Province of Newfoundland and Labrador. The Benefits Strategy outlines the necessary requirements to provide opportunities and benefits for the people of the province. It includes clear obligations to gender equity and diversity, with an overall objective to address employment equity and business access for traditionally underrepresented groups. This Program is the cornerstone for optimizing the benefits of the Projects for all people of Newfoundland and Labrador.

3.2. Lower Churchill Impacts and Benefits Agreement

In recognition of the claim by the Innu of Labrador to Aboriginal rights and title in the area of the Projects, Nalcor has entered into an Impacts and Benefits Agreement (IBA) with Innu Nation to address Innu interests.

Nalcor has made IBA commitments regarding employment and training, workplace policies, business opportunities and environmental management, including specific initiatives regarding women. In addition to its IBA commitments, Nalcor has undertaken additional initiatives to enhance employment and training opportunities for Labrador Innu. These commitments are important elements of LCP’s objectives to support a diverse workplace, and the Program is consistent with Nalcor’s IBA commitments.

3.3. Applicability of the Program to Project Construction Activities

As per the Benefits Strategy, this Program applies to work on the following:²

- Construction of the Muskrat Falls hydroelectric generating station
- Construction of the Labrador Transmission Assets in Labrador
- Construction of the Labrador Island Transmission Link.

² The initiatives, goals and objectives for the Program will be reassessed prior to a sanction decision for the Gull Island project.

3.4. Hiring Priority

The Benefits Strategy has established adjacency-based employment protocols:

For the construction of the lower Churchill generating stations at Gull Island and Muskrat Falls and associated High Voltage alternating current (HVac) transmission facilities in Labrador, the hiring protocol is as follows:

1. Qualified Labrador Innu as per the IBA
2. Qualified residents of Labrador
3. Qualified residents of Newfoundland and Labrador
4. Qualified residents of Canada

For construction of the Labrador-Island Transmission Link (LIL), the hiring protocol is as follows:

1. Qualified Labrador Innu for work in Labrador as per the IBA
2. Qualified residents of Newfoundland and Labrador
3. Qualified residents of Canada

3.5. Benefits Strategy Gender and Diversity Requirements

The Benefits Strategy outlines the following requirements to be incorporated into the Gender Equity and Diversity Program, as noted on pages 7-9 of the Benefits Strategy:

Gender Equity Plan

The objectives of the Gender Equity Plan will be to address employment equity for the Projects, including access to employment opportunities for and employment of qualified women in the Projects, with an emphasis on continuous improvement. The plan will implement proactive programs and practices that contribute to the creation of an inclusive work environment and corporate culture. The plan will promote accountability and responsibility for gender equity.

The Gender Equity Plan shall include a women's employment plan and business access strategy (WEP) in which LCP will establish quantitative goals for employment of women at all phases of the Projects. LCP will initially set such goals by taking into account the availability of women in particular occupational categories as identified by Statistics Canada in its Employment Equity Data Report. The WEP will institute ongoing programs and processes to facilitate employment and participation for women in all phases of the Projects, and at all facilities, sites and offices in the Province where work performed by LCP and its primary contractors relating to the Projects is taking place.

The WEP will include the following provisions:

- LCP will put in place the necessary organizational resources to develop and implement the WEP;
- LCP will support training and recruitment programs for women in consultation with training and educational institutions in the Province;
- LCP will provide facilities for the Projects that are accommodative of women, and will require a safe and respectful work environment;

- LCP will require that each primary contractor to the Projects provide LCP with a plan for compliance with the WEP, and will require that contracts related to the execution of the Projects include an acknowledgement from the successful bidder that they are aware of the existence and importance of the WEP;
- LCP will identify and implement special measures to attract and secure employment of women in occupations where women are under-represented, including setting longer term qualitative goals to employ more women in occupational areas where women are historically under-represented;
- LCP will develop an implementation schedule and will report on progress to the Government; and
- LCP will consult on development and progress on the WEP in an annual consultation with the Government and other stakeholders, including community groups.

Diversity Plan

The objectives of the Diversity Plan will be to address employment equity for the Projects, including access to employment opportunities for and employment of qualified members of underrepresented groups in the Projects, with an emphasis on continuous improvement. The plan will implement proactive programs and practices that contribute to the creation of an inclusive work environment and corporate culture. The plan will promote accountability and responsibility for diversity.

The Diversity Plan shall include a business access strategy for underrepresented groups in which LCP will establish quantitative goals. The Diversity Plan will institute ongoing programs and processes to facilitate employment and participation for underrepresented groups in all phases of the Projects, and at all facilities, sites and offices in the Province where work performed by LCP and primary contractors relating to the Projects is taking place.

The Diversity Plan will include the following provisions:

- LCP will put in place the necessary organizational resources to develop and implement the Diversity Plan;
- LCP will support training and recruitment programs for disadvantaged groups in consultation with training and educational institutions in the Province;
- LCP will require that each primary contractor to the Projects provide LCP with a plan for compliance with the Diversity Plan, and will require that contracts related to the execution of the Projects include an acknowledgement from the successful bidder that they are aware of the existence and importance of the Diversity Plan;
- LCP will develop an implementation schedule and will report on progress to the Government; and
- LCP will consult on development and progress on the Diversity Plan in an annual consultation with the Government and other stakeholders, including community groups.

3.6. Collective Agreements

The majority of people working on the Projects will be employed by contractors and will work in a unionized environment. This Program has been considered during the negotiations for the collective agreements specific to each component of the Projects.

The collective agreements are as follows:

1. The collective agreement between Muskrat Falls Employers' Association Inc. and Resource Development Trades Council of Newfoundland and Labrador for the Construction of the Lower Churchill Hydroelectric Generation Project at Muskrat Falls on the lower Churchill River Newfoundland and Labrador (MFEA and RDC)³;
2. The Lower Churchill Project Transmission Construction Collective Agreement between Lower Churchill Transmission Construction Employers' Association Inc. and International Brotherhood of Electrical Workers and IBEW Local Union 1620 (LCTCEA and IBEW 1620)⁴; and
3. The Lower Churchill Reservoir Clearing Collective Agreement between Lower Churchill Reservoir Clearing Employers' Association Inc. and Labourers International Union of North America and Construction and General Labourers' Union, Rock and Tunnel Workers Local 1208 (LCRCEA and Local 1208)⁵.

The specific clauses that relate to gender equity and diversity in each of the collective agreements are included in Appendix A.

³ http://www.gov.nl.ca/lra/collective/pdf/naics22/MFEA_RDTCNL_2012_2017.pdf

⁴ http://www.gov.nl.ca/lra/collective/pdf/naics22/LCT_CEA_IBEW_2012_2017.pdf

⁵ http://www.gov.nl.ca/lra/collective/pdf/naics22/LCRC_Collective_Agreement_2012_2017.pdf

4. CORPORATE AND PROJECT POLICIES AND REQUIREMENTS

4.1. Application of Corporate Policies

The application of Nalcor's corporate strategies and principles is an important consideration in the development of Project-specific plans by LCP, as it is a subsidiary of Nalcor.

4.2. Nalcor's Core Values

The development and implementation of the Program is guided by Nalcor's Core Values:

Open Communication

Fostering an environment where information moves freely in a timely manner

Accountability

Holding ourselves responsible for our actions and performance

Safety

Relentless commitment to protecting ourselves, our colleagues, and our community

Honesty and Trust

Being sincere in everything we say and do

Teamwork

Sharing our ideas in an open and supportive manner to achieve excellence

Respect and Dignity

Appreciating the individuality of others by our words and actions

Leadership

Empowering individuals to help guide and inspire others

4.3. Nalcor's Diversity and Inclusion Strategy

In 2010, Nalcor developed its Diversity and Inclusion Strategy and a multi-year action plan. Nalcor's Leadership Team formally endorsed the strategy in early 2011. As part of the strategy's action plan, Nalcor established a Diversity Council to help foster employee engagement with the strategy and to promote its tools for increasing diversity and inclusion practices within the company.

The Diversity Council provides advice to the Human Resources (HR) Department on diversity issues and initiatives as Nalcor continues to move forward with its strategy. The Council is made up of about a dozen employees throughout the organization, representing different backgrounds and levels of management.

Other activities carried out since the development of the new strategy include the integration of diversity commitment into public recruitment ads, reviewing/developing HR and employment policies, and identification of external groups/associations with whom Nalcor may wish to work with in regards to diversity/inclusion initiatives.

Work has been ongoing since spring 2013 to develop part one of a two-part workshop series that will lay the ground work for the implementation of the Diversity and Inclusion Strategy. The pilot launched in August 2013 and with refinements added to the session in September 2013.

Nalcor's Diversity and Inclusion Strategy has as its primary goal: *Building and maintaining a skilled and high performing workplace environment that is respectful and accepting of individual differences and experiences resulting in innovation, creativity, and competitiveness.*

The company has identified several best practices on which to base the development and implementation of its diversity framework:

- **Leadership commitment** from senior management and the board is essential.
- **Passion** from middle managers and directors has enabled the program to build slowly but steadily in the company.
- **Community engagement with key leaders** in target groups has led to strong relationships and unexpected benefits and opportunities.
- **Openness to learning is critical.** Learnings and experiences of others provide valuable input. Adaptive approaches are required, as initial concepts may need modification in order to better achieve goals.
- **Creating a workplace where questions are supported and encouraged** means supporting the conversation about what diversity and inclusion means to employees and their communities.

These values and best practices have been integrated in the Program for LCP as Nalcor aims for congruency with its diversity framework across all projects arising from its lines of business. The LCP GED Program combines efforts in recruitment and employment with robust equity and diversity policy to increase the presence and contributions of underrepresented groups resulting in a positive workplace culture on LCP worksites and in the future, elsewhere within Nalcor.

4.4. Code of Conduct and Business Ethics Handbook

Nalcor is dedicated to developing a work environment conducive to productivity and effectiveness and which enables employees to demonstrate Nalcor's values, with an emphasis on respect, dignity and teamwork in achieving its vision for diversity and inclusion:

“Our workplace is described as an inclusive and respectful one. We collectively believe that diversity of backgrounds, ideas and experiences enriches our company and contributes to an innovative, high performance environment. We embrace individual differences and enable each other to reach our full potential.

Nalcor's employees are guided in this goal by the company's code of conduct and business ethics. The handbook outlines the specifics of the company's vision and values reflected in everyday work practice. The handbook states:

“Nalcor employees deserve to work in an environment where they are treated fairly and with respect. We must all take steps to ensure we are respectful of others, supportive of the dignity and self-esteem of every person and promote an environment that is free of harassment. The importance of

treating each other with respect applies to all Nalcor employees, regardless of their role or position.”

4.5. Nalcor’s Position on Respectful Workplace Policy

Nalcor identifies behaviours the company will not tolerate in its workplace. These are: harassment, discrimination, diminishment of personal dignity and mutual respect, and the posting of offensive material in the workplace. Nalcor believes a respectful workplace is a safe workplace and that supporting gender equity and diversity will contribute positively and effectively to its primary goal of safety.

4.6. LCP Workplace Policy and Respectful Workplace Standard

LCP will develop and integrate Nalcor’s position on workplace policy into the Project worksites. LCP is committed to maintaining a safe, healthy and productive work environment where all persons attending LCP worksites are valued and treated with respect and dignity.

LCP will develop a Respectful Workplace Standard that supports Nalcor’s core values. This standard will apply to all LCP employees and consultants, LCP contractors, visitors, and others attending the LCP worksites. In addition, contractors working on LCP worksites will be required to have a Respectful Workplace Policy that meets or exceeds Nalcor’s Respectful Workplace Standard.

The Respectful Workplace Standard is intended to support a work environment that is free of discrimination, harassment, workplace violence and/or threats of workplace violence. The Respectful Workplace Standard will effectively transmit policy requirements to frontline staff as expectations for appropriate behaviours supporting respect and dignity in the workplace that is consistent with the company’s safety goal.

Details on the LCP Respectful Workplace Standard will be included in the LCP Site Handbook provided to everyone working on an LCP worksite. A copy of the LCP Site Handbook is in Appendix D.

5. GENDER EQUITY AND DIVERSITY INPUT AND STRATEGIC CONSIDERATIONS

5.1. Stakeholder Perspectives and Contributions

Nalcor and LCP developed the Gender Equity and Diversity Program through an extensive consultation process. Nalcor began its work on the Program in 2009 by meeting with organizations in individual meetings and structured open sessions. Later, LCP invited more than 40 community agencies, non-governmental organizations, and government agencies to provide input and to share information regarding priorities for the Gender Equity and Diversity Program. Consultation was, and will continue to be, carried out in accordance with LCP's consultation principles and includes an evaluation process. Feedback forms are utilized as appropriate.

The focus group sessions started in May 2012 and identified a number of key themes to guide the Projects in the development and implementation of this Program:

- Establish measurable goals for participation by underrepresented groups in the construction of the Projects.
- Facilitate LCP's involvement and support in workforce preparation, supplier development, and gender equity and diversity-related training to ensure all Newfoundlanders and Labradorians can avail of project opportunities.
- Recognize contractor and union adherence and support as key factors to successful implementation of the GED Program.
- Make regular public reports to stakeholders so that the fulfillment of commitments is documented and areas with potential for improvement can be identified.
- Include specific mitigations to the GED Program to address unique barriers for each underrepresented group considered in the Program.
- Work with committed stakeholders to bring their respective expertise, to implement a successful Program.

The preceding points have shaped LCP's approach to implementing gender equity and diversity on the Project and have provided a foundation for this document.

- Results and comments from the consultation process are provided in Appendix B.

5.2. Unique Project Considerations

The development of initiatives will need to consider the location and nature of Project activities, as well as the Projects' rotation and shift schedules for work.

Given the hiring preference for Labrador Innu and Labrador residents in the Benefits Strategy, efforts to increase female participation in Labrador will need to focus on increasing the supply of female workers who are also Labrador residents. Similarly, work at a remote site introduces the requirement that workers be away from home for extended periods. Recognizing this potential barrier for workers who have family care obligations (and a potential preference for other local projects), initiatives that increase the supply of local female workers should be considered.

5.3. Evaluation of Best Practices

LCP has completed an extensive review of best practices and has consulted extensively with key stakeholders to ensure that this Program contains the components necessary for successful implementation. A list of resources and consulted stakeholders is available in Appendix C.

6. PROGRAM GOALS, OBJECTIVES, INITIATIVES AND TARGETS

6.1. Goals and Objectives

The Program incorporates two major focus areas based on: 1) employment and 2) business access strategies across four underrepresented groups: women, Aboriginal people, persons with disabilities, and visible minorities.

The employment strategy addresses four key objectives:

- Increase the level of capacity in the four underrepresented groups to access work on the Projects;
- Ensure the recruitment and hiring processes use available resources from the four underrepresented groups and provide opportunities for new entrants to the workforce from the four underrepresented groups;
- Ensure that workplace and working conditions support the retention of workers from the underrepresented groups and contribute to an inclusive and supportive work environment; and
- Ensure successful implementation of the Program through continuous improvement and adaptive management measures.

The overarching goal of the Program's business access strategy is to ensure full and fair opportunity for work associated with the Projects to businesses owned by the underrepresented groups, recognizing that IBA commitments must be met as a first priority. The Program's key business access objectives are:

- Build awareness of the breadth of opportunities associated with the Projects (including direct, indirect, and induced opportunities) and LCP's procurement requirements to help link businesses owned by underrepresented groups with opportunities in the supply chain, and
- Ensure an understanding of the processes used by LCP for procurement.

6.2. Employment Strategy Initiatives

6.2.1. Capacity Building

LCP has, and will continue to, partner with organizations advocating for underrepresented groups to build capacity with regard to workforce and supply chain preparation and development. These include but are not limited to:

- Participating in WRDC's Techsploration and other programs.
- Delivering safety training to members of Innu Nation and women interested in Project employment.
- Participating in round table discussions regarding childcare options in Upper Lake Melville.

- Supporting profile entries in the LCP online employment database muskratfallsjobs.com

LCP supports the Labrador Aboriginal Training Partnership (LATP), which has been the primary vehicle to increase the capability of Aboriginal Labradorians to participate in the Projects and in other developments in Labrador. Through the co-operation of Innu Nation, NunatuKavut Community Council, the Nunatsiavut Government, the Government of Canada, the Government of Newfoundland and Labrador, and LCP, LATP has been successful in training over 500 individuals and has accessed over \$46 million in funding to advance training initiatives.

Initiatives of the LATP include:

- Providing tuition funding, living allowances, and childcare allowances for Aboriginal people who wish to train for opportunities associated with the Projects.
- Providing career counseling for Aboriginal people.
- Providing Project-related community-based training.
- Providing high-school equivalency testing, including oral testing for those who do not speak English as their first language.
- Providing in-class interpreters/translators or co-instructors when requested.
- Coordinating an apprenticeship pilot in which one journey person can sign off hours for up to five apprentices.
- Coordinating on-the-job training opportunities for Aboriginal people.

Consistent with the priority hiring protocol for Labrador Innu and Labrador residents, increasing Labrador workforce capacity increases the extent to which local residents benefit from the Projects.

LATP has also extended its services to Labrador women who are not Aboriginal people to enhance the gender equity and diversity goals and objectives for the Projects.

Initiatives to increase the level of capacity in the underrepresented groups to access work on the Projects are described in Table 1 on the following pages.

The reduction of barriers to employment for members of the underrepresented groups is an important measure to increase employment levels. Initiatives intended to show that members of the underrepresented groups are working on the Projects and to assist others in considering work on the Projects (and construction Projects work in general) as a viable career are provided in Tables 1 and 2. These initiatives are also intended to provide feedback to identify potential issues so LCP may take action to reduce existing barriers on the work site.

Table 1: CAPACITY BUILDING INITIATIVES

Initiative	Groups ⁶				Responsible	Schedule
	W	A	PD	VM		
Category: Communications and Outreach						
Offer pre-employment orientation to members of underrepresented groups.	*	*			Benefits Team	Ongoing since sanction
Category: Partnerships						
Participate in the LAMP which provides tuition funding, living allowances, and childcare allowances for Aboriginal people who wish to train for opportunities associated with the Projects.		*			Benefits Team	Ongoing to Q1 2015
Work with Memorial University, CNA and other registered training institutions to support increased participation of women, Aboriginal people, people with disabilities, and visible minorities in training and education programs through the provision of scholarships and training opportunities.	*	*	*	*	Communication, Benefits Team	Ongoing
Partner with Women in Resource Development Council (WRDC) and the Office to Advance Women Apprentices (OAWA) to develop a training-to-employment initiative for women, including on-the-job training opportunities where feasible.	*				Benefits Team	Ongoing
Support awareness initiatives and programs offered by government and stakeholders encouraging women and underrepresented groups to explore trades and technology.	*	*	*	*	Benefits Team	Ongoing
Work with College of the North Atlantic (CNA), union training schools and other training institutions to ensure students (past and present) are aware of job opportunities associated with the Projects and the necessary skills required.	*	*	*	*	Benefits Team, Project Leadership	Ongoing
Participate in and support education events hosted by educational and training organizations related to the Projects.	*	*	*	*	Benefits, HR	Ongoing

⁶ W – Women A – Aboriginal People PD – Persons with disabilities VM – Visible Minorities

Initiative	Groups ⁶				Responsible	Schedule
	W	A	PD	VM		
Support WRDC and OAWA through partnership development and sponsorship.	*				Benefits Team, Communications	Ongoing
Provide community investment support through Nalcor’s corporate Community Investment Program, for non-profit groups and organizations aimed at assisting the underrepresented groups.	*	*	*	*	Communications	Ongoing
LCP, its contractors and unions will work with stakeholder organizations and governments, including Child, Youth and Family Services (CYFS) to assess the need for caregiving solutions and to develop an appropriate response in the region adjacent to the Projects resulting in creative and adaptable options for childcare in keeping with provincial regulations.	*				Benefits	Ongoing
LCP will support and promote early childcare education programs in the Upper Lake Melville Region through <ul style="list-style-type: none"> ○ Identification of potential caregiving resources ○ Promotion of information on child care resources ○ Support for the recruitment of additional child care professionals through the provision of scholarships to aid students enrolled in early child care education at a registered training institution ○ Investigation of opportunities to facilitate increased access to childcare. 	*				Benefits	Ongoing

6.2.2. Recruitment and Hiring Processes

The Program is predicated on supporting gender and employment diversity as a key principle for business success and in developing and providing tools which will facilitate this approach.

LCP's website, muskratfallsjobs.com, supports recruitment for the Projects. The site allows workers to register and provide key hiring information, such as residency, experience, training, and affiliation in the underrepresented groups.

The website is promoted as a hiring resource with potential workers, contractors, and unions. LCP will also use its website data as appropriate and necessary to identify qualified members of underrepresented groups.

LCP has developed resources to assist individuals in completing an online profile, including: a step-by-step information brochure and a video that explains the process of creating and editing an employment profile.

LCP also assists individuals by working directly with them to create and edit their online profile.

LCP hosts employment information sessions to deliver information to stakeholders, including the underrepresented groups identified in the Program.

In addition to LCP's recruitment activities listed above, each union maintains an out-of-work list for the Projects.

Further initiatives to ensure the recruitment and hiring processes information and resources are accessible to the underrepresented groups are described in Table 2.

Table 2: RECRUITMENT AND HIRING INITIATIVES

Initiative	Groups				Responsible	Schedule
	W	A	PD	VM		
Category: Communications and Outreach						
Include a gender equity and diversity inclusion statement in recruitment materials related to LCP.	*	*	*	*	Communications, HR	Ongoing
Provide underrepresented groups with Project information to ensure members of key target audiences are informed of available employment and training opportunities.	*	*	*	*	Benefits, Communications	Ongoing
Communicate muskratfallsjobs.com website to potential workers via direct engagement, information brochures, videos, and through traditional and social media.	*	*	*	*	Communications, HR	Ongoing
Hold employment information sessions and hiring events (job fairs, etc.) and encourage members of the underrepresented groups to register on muskratfallsjobs.com during the event.	*	*	*	*	Communications, Consultation	Ongoing
Provide information sessions to contractors and sub-contractors on how to use the employment database to meet their hiring needs re: diversity and equality.	*	*	*	*	Benefits	Ongoing
Dedicate resources to ensure members of the underrepresented groups understand the job application process, including the role of contractors and unions, and how to register with the employment database muskratfallsjobs.com. Provide information to assist users in navigating and registering in the database.	*	*	*	*	Benefits, HR, Communications	Ongoing since Oct 2012
Dedicate resources to provide hands-on assistance to members of the underrepresented groups to register on the employment database muskratfallsjobs.com.	*	*	*	*	Benefits, Communications	Ongoing since Oct 2012

Hold province-wide recruitment and employment information sessions and use stakeholder and government networks to invite/ensure individuals from the underrepresented groups are aware and can participate.	*	*	*	*	Communications, Consultation, Benefits	Ongoing since sanction
Participate in events such as conferences, career fairs, and other events applicable to LCP, that promote participation/awareness in the trades among the underrepresented groups.	*	*	*	*	Benefits, HR, Communications, Consultation	Ongoing
Ensure recruitment information is available in accessible formats and plain language upon request.		*	*	*	Benefits, Communications	Ongoing
Develop Project promotional and communications materials using positive images and articles/profiles that highlight role models from the underrepresented groups working on the Projects.	*	*	*	*	Communications	Ongoing
Use traditional and social media to promote employment opportunities for the Projects.	*	*	*	*	Communications	Ongoing
Use appropriate language and imagery in all job ads to encourage members of the underrepresented groups to apply for job opportunities.	*	*	*	*	Communications, HR	Ongoing
Use visual representation of the underrepresented groups in print and electronic public education and promotional materials.	*	*	*	*	Communications	Ongoing
Category: Compliance						
Integrate progressive apprenticeship ratios in Project collective agreements by <ul style="list-style-type: none"> ○ Ensuring affiliation re: Gender and Aboriginal is a consideration in the hiring of qualified apprentices ○ Maximizing use of available apprenticeship programs to assist LCP and its contractors in recruiting/hiring individuals from the target groups. 	*	*	*	*	HR	Ongoing

Monitor the Muskrat Falls employment database for potential workers from the underrepresented groups and advise applicable contractors and unions.	*	*	*	*	Benefits	Ongoing since Oct 2012
Qualified workers will not be required to be members of the union to be referred to bargaining unit positions. They will be represented by the union once employed.	*	*	*	*	HR	Ongoing
Potential workers/workers will be asked for recruitment purposes or on point-of-hire if accommodation measures are required due to a diagnosed disability, and these will be implemented where feasible.			*		HR	Ongoing
Category: Partnerships						
Work with/train stakeholder groups on the use of muskratfallsjobs.com employment database (e.g., WRDC, OAWA, AES, LAMP, CNA, Avalon Employment Centre, Independent Living Resource Centre, Association for New Canadians, NunatuKavut Community Council, Nunatsiavut Government, etc.).	*	*	*	*	Benefits	Ongoing
Work with LCP contractors and unions, governments and stakeholders to encourage women and Aboriginal people to apply for Project positions.	*	*			Benefits	Ongoing
Work with stakeholder groups to identify opportunities for persons with disabilities (e.g., Independent Living Resource Centre, Avalon Employment Centre, Disability Policy Office, HRSDC Disabilities, etc.).			*		Benefits	Ongoing
Use OAWA and WRDC databases to identify potential female workers and promote available job opportunities to these women. LCP's Gender Equity and Diversity Coordinator will engage directly with these organizations to identify potential hires in response to contractors' requests for employment.	*				Benefits	Ongoing
Provide links and resource information on muskratfallsjobs.com website referencing organizations supporting underrepresented groups.	*	*	*	*	Communications	2014

LCP's Gender Equity and Diversity Coordinator, supported by contractor resources and a union representative, will work directly with individuals to identify potential caregiving resources.	*				Benefits	Ongoing
LCP's Gender Equity and Diversity Coordinator will maintain and promote a caregiver resource listing that will be made available to LCP workers.	*				Benefits	Ongoing

6.2.3. Workplace Policies and Working Conditions

The development of a respectful worksite culture is an important initiative to help meet the Projects' significant labour supply needs through the positioning of LCP as a highly desirable place to work and by orienting new hires effectively to the key aspects of a respectful workplace culture. Not only will this help create a positive and productive work environment, it will also contribute to labour relations stability on site, the retention of productive employees, and most importantly, the promotion of workplace safety for all.

LCP will develop a comprehensive Respectful Workplace Standard. The initiatives outlined in Table 3 are intended to communicate LCP's Respectful Workplace Standard and also to ensure compliance with the Standard and its mechanisms as established for Project worksites.

As well, all Project facilities will comply with applicable regulatory requirements, including accessibility and gender, as a minimum for LCP's Respectful Workplace Standard.

Table 3: RETENTION AND WORKPLACE POLICY INITIATIVES AND WORKING CONDITIONS

Initiative	Groups				Responsible	Schedule
	W	A	PD	VM		
Category: Communications and Outreach						
Make information and materials from stakeholder organizations available to LCP management, contractors and workers, including underrepresented groups.	*	*	*	*	Benefits, Comm	Ongoing
Support the establishment of diversity networks to facilitate community building amongst the underrepresented groups.	*	*		*	Project Team	Ongoing
Category: Compliance						
Develop and deliver information on LCP’s Respectful Workplace Standard to workers, contractors and stakeholders.	*	*	*	*	HR, Benefits, Communications	2013-end of construction
Require contractors to have a Respectful Workplace Standard with a zero tolerance for harassment. These policies are fully supported by the Projects’ unions.	*	*	*	*	HR	2013-end of construction
Enforce compliance with LCP Respectful Workplace Standard.	*	*	*	*	HR	2013-end of construction
Ensure LCP contractors are aware of LCP standards, practices, policies related to the employment of underrepresented groups.	*	*	*	*	Benefits	2013-end of construction
Display LCP’s corporate values and respectful workplace statement at LCP worksites.	*	*	*	*	HR, Communications	2013-end of construction
Ensure all workers participate in Gender Awareness training.	*				Benefits (Training)	Ongoing since 2013
Ensure all workers participate in Respectful Workplace Policy training.	*	*	*	*	Benefits (Training)	Ongoing since 2013
Ensure all workers participate in Aboriginal cultural awareness sessions.		*			Benefits (Training)	Ongoing since 2013
Provide supervisors and shop stewards with additional respectful workplace training to enable them to handle any situations that arise in a safe and appropriate manner.	*	*	*	*	Benefits Team (Training)	Ongoing

Initiative	Groups				Responsible	Schedule
	W	A	PD	VM		
Incorporate diversity considerations into the corporate performance assessment process to ensure that performance is assessed without bias.	*	*	*	*	Nalcor HR	2014
Support onsite cultural events for Aboriginal people, considering ongoing work priorities, safety and security requirements, and site policies.		*			Benefits, IBA Lead, Communications	2013-end of construction
Develop shift schedules that address work-life balance in the development of shift schedules and where possible, provide flexibility in individual working schedules to accommodate family responsibilities and cultural considerations.	*	*	*	*	HR	Ongoing
Reinforce messaging about gender equity and diversity through: tool box talks, Lunch and Learns, supervisory training, shop stewards meetings, worksite posters and stickers.	*	*	*	*	Benefits	Ongoing
Ensure worksites, common areas, parking lots are well lit to support personal safety.	*	*	*	*	Safety	Ongoing
Ensure appropriate security is onsite at all times, including female security staff at the Muskrat Falls site.	*	*	*	*	Safety	Ongoing
Ensure permanent accommodation facilities have units that adhere to accessibility standards as per the NL Buildings Accessibility Act and Regulations.			*		Safety	Ongoing
Ensure Project accommodation sites recognize the needs of women (e.g. worksites will have adequate female washroom facilities as per occupational health and safety regulation).	*				Safety	Ongoing
Require all contractors to provide appropriately-sized tools and safety equipment for employees, such as proper-fitting gloves and personal protective equipment (PPE).	*	*	*	*	Contractors, Safety	Ongoing
Ensure safety standards and emergency procedures recognize the needs of persons with disabilities.			*		Safety	Ongoing
Provide supports to persons with diagnosed disabilities where feasible.			*		HR	Ongoing
Provide information to all workers dealing with violence of any kind.	*				Benefits	Ongoing

Initiative	Groups				Responsible	Schedule
	W	A	PD	VM		
Coordinate on-the-job training opportunities where feasible for members of underrepresented groups.	*	*	*	*	Benefits	As required
Category: Partnerships						
Work with stakeholders to develop a Trades Workplace Cultural Awareness program for visible minorities including safety standards and required certifications.			*		Benefits	Q2/Q3 2014
Support union efforts to develop a mentorship program to assist females and other individuals from underrepresented groups in obtaining the skill, ability and competence to be shop stewards as they (unions) acknowledge their commitment to account for gender equity and diversity considerations when appointing shop stewards so females and other individuals from underrepresented groups with the skill, ability and competence have the opportunities to be appointed as shop stewards.	*	*	*	*	HR, Unions	2014-end of construction

6.2.4. Continuous Improvement and Adaptive Management

Both Nalcor and LCP are committed to the principle of continuous improvement. The safety model also supports accountability and responsibility at both the individual and the management levels.

Through this Program, LCP will monitor on a regular basis its gender equity and diversity programs and introduce responsive policy changes as needed within the continuous improvement framework.

LCP will use various tools to collect the necessary information in a way that supports workers, especially women and members of underrepresented groups, in bringing forward their concerns in a safe and protected manner. This includes, but is not limited to, the following qualitative and quantitative approaches:

- formal internal reviews in both the development and revision stages
- one-on-one discussion with employers, supervisors and management
- formal and informal focus groups with management staff and employees
- climate and/or exit surveys with management staff and employees
- corrective measures will be implemented as required

Recommendations for changes arising from these approaches for feedback will be considered with respect to safety, productivity and cost, and a plan for execution of any necessary corrective measures will be developed.

Earlier efforts in GED plans supporting other natural resource-driven projects have focused on increasing participation through effective recruitment and retention efforts. In addition to its own ongoing initiatives to support increased participation through training and workplace readiness, LCP is committed to developing and ensuring a safety focused work site culture that supports diversity and inclusion as keystones to success in this goal. Nalcor, through LCP and its GED Program, believes its efforts to create a responsive, result-based gender equity and diversity process as a learning opportunity for future resource-based construction projects.

Table 4: CONTINUOUS IMPROVEMENT AND ADAPTIVE MANAGEMENT MEASURES

Initiative	Groups				Responsible	Schedule
	W	A	PD	VM		
Category: Communications and Outreach						
Review best practices and incorporate initiatives as necessary to adapt to lessons learned.	*	*	*	*	Benefits	Ongoing
Review existing policies and procedures to enhance language in support of workplace diversity.	*	*	*	*	Benefits	Ongoing
Review LCP’s qualitative and quantitative goals for the Program and implement any needed revisions as part of the adaptive management process.	*	*	*	*	Benefits	Ongoing
Engage with members of the underrepresented groups at work sites on an ongoing basis using diversity and gender equity champions on site to facilitate engagement.	*	*	*	*	Benefits Team	Ongoing
Conduct research using tools such as focus groups, surveys, meetings, and/or interviews of workers to gather feedback in a safe and protected manner on the effectiveness of initiatives and to collect suggestions for adaptive management.	*	*	*	*	Benefits	Annually
Conduct employee surveys/interviews for LCP Project Delivery team on exit from LCP to identify any gender equity and diversity challenges, and endeavour to implement corrective measures as required.	*	*	*	*	HR	2014-end of construction
Report regularly (monthly, quarterly and annually) on the GED Program’s accomplishments and initiatives derived from the employment initiatives and targets.	*	*	*	*	Benefits, Communications	Ongoing since Jan 2013
Category: Compliance						
Carry out an annual audit of GED initiatives to document successes in meeting commitments, to identify areas of concern, and to implement any adjustments to the GED Program as a result.	*	*	*	*	Benefits	2014-end of construction

Initiative	Groups				Responsible	Schedule
	W	A	PD	VM		
Category: Partnerships						
Review best practice initiatives from other regions related to childcare.	*				Benefits	Ongoing

6.3. Employment Targets

The Program sets quantitative goals for Project participation for women and members of underrepresented groups. These goals are based on supply data and current Project estimates. Progress on achievement of these goals will be monitored on a quarterly basis and will be re-evaluated on an annual basis.

6.3.1. Project Participation

Women

- 1,000 women registered in muskratfallsjobs.com, LCP's employment database
- An initial target of 8% of apprentices, reviewed annually and increased for individual trades (up to 25%) where labour supply is available in accordance with the hiring protocol. In construction trades, women currently represent approximately 4% of the workforce.
- 20% of total Project hours worked, 3.9 million hours, 375 full-time equivalents (FTEs) per year, 1,875 person years over the life of the Projects.
- 12% of all trades and labour hours worked, 1.2 million hours, 115 FTEs per year, 577 person years over the life of the Projects.
- 35% of all Project Support hours, 1.3 million hours, 125 FTEs per year, 625 person years over the life of the Projects.
- 30% of all Engineering, Professional and Technical hours worked, 965,000 hours, 93 FTEs per year, 464 person years over the life of the Projects.
- 30% of all Project Management hours worked (110,000 hours, 11 FTEs per year, 55 person years over the life of the Projects).
- 50% of work-term students (including similar roles, such as summer students, co-op program hires, or interns) employed by LCP.

Aboriginal People

- 1,000 Aboriginal people registered in muskratfallsjobs.com, LCP's employment database
- 8% of apprentices. Aboriginal people comprise approximately 3% of the construction industry's workforce nationally.
- 10% of total Project hours worked; estimated at 1.8 million hours, 183 FTEs per year, 915 person years over the life of the Projects.
- 20% of all Project Support hours; estimated at 730,000 hours, 73 FTEs per year, 365 person years over the life of the Projects.
- 30% of work-term students employed by LCP and its contractors in Labrador.

People with Disabilities

- 50 workers on site who have self-identified as a person with a disability.
- 50 accommodative measures put in place for persons with disabilities.
- 25 positions identified for persons with disabilities. These positions will be forwarded to stakeholder groups and qualified individuals will be encouraged to apply.

Visible Minorities

- 30 workers associated with the Projects that have self-identified as a visible minority.

6.4. Business Access Strategy Initiatives

6.4.1. Build Awareness of Project Opportunities

The overarching goal of the business access strategy is to ensure full and fair opportunity for goods and services on a competitive basis for work associated with the Projects to businesses owned by the underrepresented groups, as well as fulfilling the IBA commitments regarding Innu business opportunities.

One of LCP's business access strategies is to build awareness of the breadth of opportunities associated with the Projects (including direct, indirect, and induced opportunities), and LCP's procurement requirements and processes.

The initiatives to achieve this objective are outlined in Table 5.

Table 5: PROJECT/CONTRACT OPPORTUNITY AWARENESS INITIATIVES

Initiative	Groups				Responsible	Schedule
	W	A	PD	VM		
Category: Communications and Outreach						
Communicate Project requirements through supplier development workshops.	*	*	*	*	Consultation, Procurement	2011-2014
Communication directed to the underrepresented groups for procurement opportunities.	*	*	*	*	Communications, Consultation	2013 to Project commissioning
Advertisements identifying breadth of opportunities with invitations to the underrepresented group businesses to participate in business opportunity sessions.	*	*	*	*	Communications	2013 to Project commissioning
Invite underrepresented group business owners to supplier workshops/information sessions.	*	*	*	*	Communications, Consultation	2011 to 2014
Provide information to the underrepresented groups on indirect, direct and induced contracting opportunities and encourage business owners to seek out these business opportunities.	*	*	*	*	Consultation, Procurement, Communication	2013 to Project commissioning
Outreach to business community through Business Opportunities Committee.	*	*	*	*	Consultation, Procurement	2013 to Project commissioning
Participation by LCP and LCP contractors in events directed at the underrepresented group business owners.	*	*	*	*	Consultation, Procurement	2013 to Project commissioning
Initiate and/or plan a public event focusing on encouraging female involvement in business opportunities for the Projects	*				Communications, Consultation	2011-2014
Promote/profile business owners associated with the Projects.	*	*	*	*	Communications	2014

Initiative	Groups				Responsible	Schedule
	W	A	PD	VM		
Category: Compliance						
Regular (monthly) reporting of GED Program accomplishments/initiatives related to business opportunities.	*	*	*	*	Benefits, Communications	Ongoing since Jan 2013
LCP and its contractors will provide, upon request, procurement documents in accessible formats.			*		Procurement	As required
Category: Partnerships						
Partnerships with stakeholder groups to deliver supplier information sessions to target business owners, including: Newfoundland and Labrador Organization of Women Entrepreneurs (NLOWE), Innu Nation, HVGB Chamber of Commerce, Board of Trade, etc.	*	*	*	*	Consultation, Communication	Ongoing

6.4.2. Ensure Understanding of the Projects' Procurement Requirements

LCP has established processes to address Project requirements and to qualify contractors and suppliers.

LCP is committed to ensuring there is an understanding by the underrepresented groups of the processes used by LCP for procurement.

LCP sees opportunities for future business development benefits by

- Identifying strategic areas within the broader supply/service chain to focus on supplier diversity.
- Ensuring businesses led by women and other underrepresented groups are aware of these opportunities.
- Identifying best practices and areas that the province should focus on to increase supplier diversity in the resource sector.

The IBA requires that LCP offer Innu businesses first bidding opportunity for designated LCP contracts. LCP also considers Innu content in the evaluation of all LCP contracts.

LCP has developed specific initiatives to achieve this business access strategy objective, and these are outlined in Table 6.

LCP primary contractors are encouraged to adopt these initiatives.

Table 6: PROCUREMENT PROCESSES AND REQUIREMENTS

Initiative	Groups				Responsible	Schedule
	W	A	PD	VM		
Category: Communications and Outreach						
Encourage businesses/joint ventures owned by the underrepresented groups to register in the LCP vendor database.	*	*			Benefits, Procurement, Communications	Ongoing
Direct contractors to organizations representing women-owned businesses, such as NLOWE.	*				Benefits, Procurement	Ongoing to year end 2014
Provide information regarding businesses owned by the underrepresented groups to LCP team who make purchasing decisions.	*	*	*	*	Benefits, Procurement	Ongoing to year end 2014
Enhance capacity and expertise by piloting and refining education/awareness sessions including specific content and supporting materials regarding requirements of procurement process in association with business/municipal partners such as NLOWE	*	*	*	*	Benefits, Procurement	Ongoing to year end 2014
Category: Compliance						
Encourage businesses/joint ventures owned by the underrepresented groups to self-identify during the Expression of Interest (EOI) and Requests for Proposals (RFP) processes.	*	*			Procurement, Communication, Consultation	Ongoing to year end 2014
Provide full and fair opportunity through the procurement processes of LCP and its contractors to businesses/joint ventures owned by the underrepresented groups to compete for contracts associated with the construction of the Projects.	*	*	*	*	Procurement, Contractors	Ongoing to year end 2014
Give consideration in the procurement evaluation process to businesses/joint ventures that are owned by the underrepresented groups.	*	*			Procurement	Ongoing to year end 2014
Provide feedback, when requested, on LCP's procurement process.	*	*	*	*	Procurement	Ongoing as required

6.4.3. Business Access Targets

The following business access targets have been established for the Projects:

Women-Owned Businesses/Joint Ventures

- 100 women attend Project supplier information sessions.
- \$10 million in expenditure (contracts, subcontracts and purchase orders) to women-owned businesses and joint ventures

Aboriginal-Owned Businesses/Joint Ventures

- 100 Aboriginal people attend LCP supplier information sessions.
- 100 Aboriginal businesses/joint ventures registered in LCP's vendor database
- \$140 million in expenditure (contracts, subcontracts and purchase orders) to Aboriginal businesses and joint ventures.

6.5. Innu Initiatives

The Labrador Innu claim Aboriginal rights and title to a significant portion of Labrador, including the Project areas. The Innu Nation land claim was accepted by the federal government for negotiation in 1978 and negotiations are currently ongoing between the federal government, provincial government and Innu Nation.

In recognition of this claim, Nalcor has entered into an Impacts and Benefits Agreement (IBA) with Innu Nation to address Innu interests in the Project areas.

Nalcor has made IBA commitments in relation to employment and training, workplace policies, business opportunities and environmental management, including specific initiatives regarding women. In addition to its IBA commitments, Nalcor has undertaken special initiatives to enhance employment and training opportunities for Labrador Innu.

Table 7 outlines the IBA and other initiatives in support of Labrador Innu participation in employment and business opportunities associated with the Projects.

Table 7: IBA COMMITMENT INITIATIVES

Initiative	Labrador Innu	Responsible	Schedule
Category: Employment and Training			
Hire an Innu Employment and Training Coordinator to support priority hiring for qualified Labrador Innu and associated training and employment supports.	*	IBA Lead	Completed
Assist Innu Nation to develop an Innu training plan and to access third-party funding for Innu interested in working on the Projects.	*	IBA Lead	Completed (LATP)
Provide on-the-job training opportunities through Nalcor and in cooperation with Project contractors.	*	IBA Lead	Ongoing through end of construction
Provide, where possible, the services of Nalcor's training coordinators to deliver safety certification courses to enhance employment qualifications of Innu interested in working on the Projects, including delivery of training in Sheshatshiu and Natuashish.	*	IBA Lead	Ongoing through Q1 2015 (LATP)
Hold employment information sessions and providing assistance with the job application process, including offering these services in Sheshatshiu and Natuashish.	*	IBA Lead	Ongoing through Q1 2015
Award scholarships to Innu post-secondary students and participating in career fairs and related activities in Innu schools and communities.	*	IBA Lead	Ongoing through IBA term
Provide summer employment and work terms through Nalcor and in cooperation with Project contractors.	*	IBA Lead	Ongoing through end of construction
Category: Workplace Policies and Conditions			
Include IBA commitments in Projects' collective agreement negotiations.	*		Completed

Initiative	Labrador Innu	Responsible	Schedule
Consult with Innu Nation on workplace policies, including: alcohol and drug use, harvesting in the Project areas, lodging and transportation of Innu employees, and translation of safety signage.	*	IBA Lead	As required
Establish workplace policies requiring mandatory Innu cross-cultural training for all employees, and prohibition of discrimination and harassment of Innu.	*	IBA Lead	Completed
Hire an on-site Innu Liaison Coordinator to assist Innu who have questions or are experiencing problems in the workplace; including provision of translation services to Innu employees who are involved in disciplinary processes or respectful workplace processes.	*	IBA Lead	Completed
Appoint a GED Coordinator to manage the LCP GED Program.	*	IBA Lead	Q3 2014
Establish a GED Working Group to oversee implementation and led by the Vice President for LCP and the Vice President Corporate Relations.	*	IBA Lead	Q3 2014
Provide workplace orientation programs to assist Innu employees to transition to the LCP workplace.	*	IBA Lead	Ongoing through end of construction
Provide Employee Assistance Program (EAP)/counselling services for Innu employees.	*	IBA Lead	Ongoing through end of construction
Provide resources for Innu social and cultural activities in the workplace.	*	IBA Lead	Ongoing through end of construction
Establish an Innu Employee Advisory Committee, including representation of Innu LCP site employees.	*	IBA Lead	Ongoing through end of construction
Work with Innu Nation to identify workplace issues which may present barriers to employment and retention of Innu women, and identifying potential corrective measures.	*	IBA Lead	Ongoing through end of construction

Initiative	Labrador Innu	Responsible	Schedule
Encourage and support cultural leave and flexibility in work schedules and rotations to enable Innu employees to participate in traditional activities.	*	IBA Lead	Ongoing through end of construction
Provide country foods in the cafeteria, when available.	*	IBA Lead	Ongoing through end of construction
Category: Business Opportunities			
Provide first bidding opportunity for qualified Innu businesses for IBA-designated contracts.	*	IBA Lead	Ongoing through year end 2014
Ensure Innu content is a consideration in bid evaluations for all awarded LCP contracts.	*	IBA Lead	Ongoing through year end 2014
Establish Innu business participation target of \$134 million set for Muskrat Falls.	*	IBA Lead	Completed
Provide the Innu Business Development Centre and individual Innu businesses with information through supplier development sessions, meetings and regular communications, regarding potential contracting opportunities for Innu businesses.	*	IBA Lead	Ongoing through year end 2014
Establish a joint Nalcor-Innu Nation Innu Business Development Advisory Committee to monitor progress towards the Innu business participation target and to recommend measures to promote Innu businesses.	*	IBA Lead	Completed

6.6. Program Implementation

LCP has a leadership responsibility for advancing gender equity and diversity throughout the Projects and will achieve this by:

- Providing leadership in developing and implementing this program as well as advocating and supporting gender equity and diversity initiatives
- Reporting on gender equity and diversity performance to the Government of Newfoundland and Labrador.
- Working with stakeholders and community groups.
- Holding annual gender equity and diversity consultation with governments, stakeholders and other community groups with the intent of continuous improvement through ongoing dialogue.

The success of this Program relies on the experience, support and networks of existing government initiatives and stakeholder organizations. These entities bring a wealth of expertise, motivation and programming that will set a new standard for gender equity and diversity in this province. This Program looks to stakeholder organizations and government entities to contribute the following:

- Support of the Program through existing initiatives and networks.
- Offer new ideas to capitalize on Project opportunities.
- Work with LCP, its contractors and unions to optimize opportunities by offering solution-based input.

6.7. Role of Contractors

Contractors and sub-contractors will undertake the majority of the construction work. The support, compliance and implementation of this Program is a contractual obligation for all primary contractors associated with the Projects. The Benefits Strategy states:

LCP will require that each primary contractor to the Projects provide LCP with a plan for compliance with the WEP, and will require that contracts related to the execution of the Projects include an acknowledgement from the successful bidder that they are aware of the existence and importance of the WEP.

In implementing this Program, the Projects' primary contractors, selected by LCP on the basis of the amount and type of work they are undertaking, will be required to establish various organizational requirements, including:

- Establishing gender equity and diversity goals
- Supporting the Program's quantitative goals
- Submitting detailed human resource policies
- Participating in stakeholder consultation sessions

6.8. Role of Unions

LCP will work closely with unions to support implementation of the GED Program. This means LCP and unions will:

- Ensure that collective agreement obligations in support of the gender equity and diversity plan are met
- Identify bringing forward to the Operator ways to increase diversity on the Project
- Ensure consideration of this Program in the referral of apprentices, workers and supervisors
- Support the Program's quantitative goals
- Work with LCP contractors and stakeholders to create an inclusive workplace
- Ensure unions are invited to participate in stakeholder consultation sessions.

7. LCP WORKPLACE POLICY

Workplace principles for the Projects are incorporated in the LCP Site Handbook, which is provided to every LCP employee following orientation. Each employee is required to sign their handbook, signifying acceptance of the policies, principles and values contained therein.

The orientation session is mandatory for all LCP workers and emphasized and contains components dedicated to gender equity, diversity, respectful workplace practices, and company policies governing employee behaviours and expectations contributing to a positive and affirming workplace culture.⁷

⁷ A copy of the LCP site handbook is included as Appendix D

8. MONITORING & REPORTING

LCP has established a Benefits Monitoring and Reporting System (BMRS) for the Projects.

Progress on the implementation of initiatives outlined in this plan will be reported on a monthly basis in the Monthly Project Report.

All contractors are required to submit benefits data on a monthly basis, which includes employment and expenditure data such as:

- Occupational Category
- Gender
- Aboriginal Affiliation
- Persons with a disability
- Visible Minority
- Expenditures made to businesses/joint ventures owned by women and members of underrepresented groups

Project reports, including gender equity and diversity information (activities and statistics) are submitted to the Government of Newfoundland and Labrador, consistent with sections 5.0 and 6.0 of the Benefits Strategy. These reports are published on the Projects' website (musktratfalls.nalcoreenergy.com) on a monthly basis and are available to the public. LCP, on request, will report additionally best practices which emerge from this Program to increase gender equity and diversity in the resource sector.

9. CONCLUSION

As a Crown corporation, Nalcor is uniquely positioned to advance innovative gender equity and diversity practices in the natural resources sector. Both Nalcor and LCP are committed to gender equity and diversity as a fundamental keystone of creating a respectful workplace dedicated to safety, quality, productivity and inclusiveness.

LCP developed its Gender Equity and Diversity Program using research, best practices and industry expertise in Nalcor and beyond to increase the level of participation by target groups in the Projects for both employment and business opportunities and to ensure enhanced access to the benefits derived from this involvement.

The Program offers a blueprint for advancing the participation of women, Aboriginal people, people with disabilities and visible minorities in LCP. The initiatives described in this document are designed to advance employment and business participation, while also incorporating and considering the unique features of the energy projects being developed. LCP has also established targets and monitoring processes to manage progress adaptively against the targets of traditionally underrepresented groups.

Appendix A
Gender Equity and Diversity Clauses from Collective Agreements

The collective agreements are as follows:

1. The Collective Agreement between Muskrat Falls Employers' Association Inc. and Resource Development Trades Council of Newfoundland and Labrador for the Construction of the Lower Churchill Hydroelectric Generation Project at Muskrat Falls on the Lower Churchill River Newfoundland and Labrador (MFEA and RDC).
2. The Lower Churchill Project Transmission Construction Collective Agreement between Lower Churchill Transmission Construction Employers' Association Inc. and International Brotherhood of Electrical Workers and IBEW Local Union 1620 (LCTCEA and IBEW 1620).
3. The Lower Churchill Reservoir Clearing Collective Agreement between Lower Churchill Reservoir Clearing Employers' Association Inc. and Labourers International Union of North America and Construction and General Labourers' Union, Rock and Tunnel Workers Local 1208 (LCRCEA and Local 1208").

The following specific clauses relate to gender equity and diversity in each of the collective agreements.

1. MFEA and RDC

Article 7 – Hiring Provisions

7.03 In order to meet the obligations applicable to the hiring and retention of qualified Labrador Innu and obligations contained within the Benefits Strategy, the Parties agree that all Project partners, including the Association, its Contractor members, the Council of Unions and its Union members will work proactively and progressively to advance the participation and integration in the areas of employment, training and apprenticeship for women and members of underrepresented groups as per gender Equity and diversity objectives.

7.08 a) The Parties agree that highly qualified supervision is fundamental to the success of the Project, therefore the following will apply:

- i) Foreperson and general foreperson will be selected or name hired after having received pre-employment multi-faceted training, including but not limited to safety, cultural sensitivity, respectful workplace, labour relations dispute resolution pursuant to the Agreement and productivity;
- ii) The selection of forepersons and general forepersons must be in alignment with the Benefits Strategy and Gender Equity and Diversity objectives established in consultation with the Province.

b) The Parties agree that it is fundamental to the success of the Project to have highly qualified trained employees, and accordingly agree to the following:

- i) Workers will be selected or name hired by the Contractor and/or referred by the Union from a group of workers that have received pre-employment multi-faceted orientation and training, including Site and collective agreement orientation, safety, environment, cultural and gender sensitivity, respectful workplace and productivity, as is set out above in 7.08 a), so that such employees have the skills and tools to succeed;

Article 12 Diversity and Gender Equity on the Project

12.01 The Association, its Contractor members, the Council of Unions and its Union members will promote and support Gender Equity Programs and Diversity Programs established in accordance with the Benefits Strategy. The Parties to this Agreement recognize and support the principles of diversity and employment and gender equity in the workplace and will work cooperatively to create a respectful and inclusive work culture.

12.02 The Association, its Contractor members, the Council of Unions and its Union members will support the Lower Churchill Project Gender Equity and Diversity Program and the participation goals for women and underrepresented groups established in consultation with the Province.

Article 16 Shop Stewards

- 16.01 Stewards shall be appointed by the Union Business Manager or his/her representative. Skill, ability and competency as well as Gender Equity and Diversity shall be considerations in the appointment of Stewards.

Article 34 Apprenticeship and Training

- 34.01 The Association, the Contractors, the Council of Unions and the Unions agree, in alignment with the Benefits Strategy and obligations to the Labrador Innu, to create training, development and apprenticeship opportunities.
- 34.02 The Association, the Contractors, the Council of Unions and the Unions agree to Project conditions and law, to maximize placement and utilization of apprentices as follows:
- a) Not less than one (1) apprentice for every three (3) journeypersons; and
 - b) Not more than two (2) apprentices for each journeyperson.
- 34.03 Gender Equity and Diversity shall be a consideration when hiring or referring Apprentices to the Project as part of the Parties' cooperative effort to achieve and sustain participation rates for women and underrepresented groups established in consultation with the Province.
- 34.04 The employment of apprentices (within regulatory requirements and limitations) will be promoted throughout the duration of the Project and will provide for a spectrum of apprentices from the first year through the fourth year as appropriate to their respective trade(s). The Parties will facilitate this through the effective utilization of the hiring provisions contained in Article 7 of this Agreement.

The MFEA and RDC also signed a Memorandum of Understanding on June 13, 2013 agreeing to the following key points:

1. To support and promote initiatives and plans for employment diversity.
2. To provide full access to employment opportunities for and employment of qualified women and qualified members of underrepresented groups (Aboriginal people, persons with disabilities and members of visible minorities).
3. To implement proactive programs and practices that contribute to the creation of an inclusive work environment consistent with the policies established for the Project and commitments in the Gender Equity and Diversity Program.
4. To achieve diversity objectives, the Parties have agreed to the name hiring provisions set out in Article 7.07(c) & (d).

5. The collective agreement will not frustrate access to employment for underrepresented groups.

2. LCTCEA and IBEW 1620

Article 7 – Hiring Provisions

7.03 In order to meet the obligations applicable to the hiring and retention of qualified Labrador Innu and obligations contained within the Benefits Strategy, the Parties agree that all Project partners, including Contractors, the Union and the Association will work proactively and progressively to advance the participation and integration in the areas of employment, training and apprenticeship women and members of underrepresented groups as per gender equity and diversity objectives.

- 7.09 a) The Parties agree that highly qualified supervision is fundamental to the success of the Project, therefore the following will apply:
 - i. Forepersons will be selected or name hired after having received pre-employment multi-faceted training including, but not limited to, site and collective agreement orientation and training, safety, environment, IBEW Code of Excellence, cultural and gender sensitivity, mentoring and coaching, work scheduling and budgeting, respectful workplace, labour relations dispute resolution pursuant to the agreement, communication skills, productivity, leadership, team building, management and maintaining schedule in advance of coming to work so they have the skills and tools to succeed.
 - v. The selection of foremen must be in alignment with the Benefits Strategy and Gender Equity and Diversity objectives established in consultation with the Province.
- b) The Parties agree that it is fundamental to the success of the Project to have highly trained employees, and accordingly agree to the following:
 - i. Workers will be selected or name hired by the Contractor and/or referred by the Union from a group of workers that have received pre-employment multi-faceted orientation and training, including, site and collective agreement orientation, safety, environment, IBEW Code of Excellence, cultural and gender sensitivity, respectful workplace, dispute resolution pursuant to the Agreement and productivity, so that such employees have the skills and tools to succeed.

Article 12 – Diversity and Gender Equity on the Project

12.01 The Association, its Contractor members and the Union will promote and support Gender Equity Programs and Diversity Programs established in accordance with the Benefits Strategy and programs established in order to support the training, hiring and retention of Labrador Innu. The parties to this Agreement recognize and support the

principles of diversity in employment and gender equity in the workplace, and will work cooperatively to create a respectful and inclusive work culture.

- 12.02 The Association, its Contractor members and the Union will support the Lower Churchill Project Gender Equity and Diversity Program and the participation goals for women and underrepresented groups established in consultation with the Province.

Article 16 – Shop Stewards

- 16.01 Stewards shall be appointed by the Union Business Manager or his/her representative. Gender Equity and Diversity shall be considerations in the appointment of stewards. When a scheduled second and/or third shift occurs, stewards for such shift(s) may be appointed. Such appointments shall be confirmed in writing to the Contractor and the Association. Stewards assigned to represent a particular shift will not retain their status if that shift is cancelled.

Article 24 – Accommodations

- 24.07 Accommodations will take into account the requirements of a diverse workforce.

Article 34 – Apprenticeship and Training

- 34.01 The Association, the Contractors and the Union, in alignment with the Benefits Strategy and obligations to the Labrador Innu, agree to work cooperatively to create training, development and apprenticeship opportunities as part of their joint responsibility to maintain a supply of skilled tradespersons for the Project.
- 34.02 The Parties agree to cooperate to the fullest extent with any government instituted Apprenticeship Training Plan including layoff for yearly in-school training where requested by the employee.
- 34.03 The Association, the Contractors and the Union agree, to the extent permitted by Project conditions and law, to maximize placement and utilization of apprentices.
- 34.04 Gender equity and diversity shall be a consideration when hiring or referrals of apprentices to the Project as part of the Parties cooperative efforts to achieve, sustain and hopefully surpass participation goals for women and underrepresented groups established in consultation with the Province.

The LCTCEA and IBEW also signed a Memorandum of Understanding on May 17, 2013 agreeing to the following key points:

1. To support and promote initiatives and plans for employment diversity.
2. To provide full access to employment opportunities for and employment of qualified women and qualified members of underrepresented groups (Aboriginal people, persons with disabilities and members of visible minorities).

3. To implement proactive programs and practices that contribute to the creation of an inclusive work environment consistent with the policies established for the Project and commitments in the Gender Equity and Diversity Program.
4. To achieve diversity objectives, the Parties have agreed to the name hiring provisions set out in Article 7.08(b) & (c).
5. The Collective Agreement will not frustrate access to employment for underrepresented groups.

3. LCRCEA and Labourers 1208

Article 7 – Hiring Provisions

- 7.03 In order to meet the obligations applicable to the hiring and retention of qualified Labrador Innu and obligations contained within the Benefits Strategy, the Parties agree that all Project partners, including Contractors, the Union and the Association will work proactively and progressively to advance the participation and integration in the areas of employment, training and apprenticeship for women and members of underrepresented groups as per gender equity and diversity objectives.
- 7.06 a) The Parties agree that it is fundamental to the success of the Project to have highly trained employees, and accordingly agree to the following:
- i. Workers will receive, prior to employment, pre-employment multifaceted orientation and training, including, site and collective agreement orientation, safety, environment, cultural and gender sensitivity, and respectful workplace, so that such employees have the skills and tools to succeed.

Article 12 – Diversity and Gender Equity on the Project

- 12.01 The Association, its Contractor members and the Union will promote and support Gender Equity Programs and Diversity Programs established in accordance with the Benefits Strategy and programs established in order to support the training, hiring and retention of Labrador Innu. The parties to this Agreement recognize and support the principles of diversity in employment and gender equity in the workplace, and will work cooperatively to create a respectful and inclusive work culture.
- 12.02 The Association, its Contractor members and the Union will support the Lower Churchill Project Gender Equity and Diversity Program and the participation goals for women and underrepresented groups established in consultation with the Province.

Article 16 – Shop Stewards

- 16.01 Stewards shall be appointed by the Union Business Manager or his/her representative. Gender Equity and Diversity shall be considerations in the appointment of stewards.

Article 22 – Accommodations

22.05 Accommodations will take into account the requirements of a diverse workforce.

The LCRCEA and Labourers also signed a Memorandum of Understanding on May 21, 2013 agreeing to the following key points:

1. To support and promote initiatives and plans for employment diversity.
2. To provide full access to employment opportunities for and employment of qualified women and qualified members of underrepresented groups (Aboriginal people, persons with disabilities and members of visible minorities).
3. To implement proactive programs and practices that contribute to the creation of an inclusive work environment consistent with the policies established for the Project and commitments in the Gender Equity and Diversity Program.
4. To achieve diversity objectives, the Parties have agreed to the Contractor hiring provisions set out in Article 7.05(a) and union referral provisions contained in Article 7.05(b).
5. The Collective Agreement will not frustrate access to employment for underrepresented groups.

Appendix B

Gender Equity & Diversity Program 2012 Consultation Report

A. INTRODUCTION

The Government of Newfoundland and Labrador and Nalcor Energy are committed to the principles outlined in the province's Energy Plan with respect to construction of the Lower Churchill Hydroelectric Generation Project and the Labrador-Island Transmission Link.

The Department of Natural Resources has outlined gender equity and diversity requirements for industrial developments, including the Lower Churchill Project (LCP). These requirements, as well as the LCP's Benefits Strategy negotiated with the Province of Newfoundland and Labrador, provide the framework for Nalcor's Gender Equity and Diversity Program for construction of the Lower Churchill Project.

In developing the LCP Gender Equity and Diversity Program Nalcor invited the following organizations to provide input and feedback on the proposed program.

NGO's and Government	Sheshatshiu Innu First Nation Mushuau Innu First Nation NunatuKavut Community Council Nunatsiavut Government Violence Prevention organizations Women's Safe Houses/Shelters Women's policy office Women in Resource Development Corporation (WRDC) Women in Apprenticiable Trades Vale Diversity Committee Women in Science and Engineering Women Interested in Successful Employment Newfoundland and Labrador Organization of Women Entrepreneurs (NLOWE) Ananaukatiget Tuningit Inuit Regional Women's Group Women's Centre's (St. John's and Labrador) Multicultural Women's Association Department of Natural Resources Department of Education - Apprenticeship Registration Office to Advance Women Apprentices NSERC/Petro-Canada Chair for Women in Science and Engineering, Atlantic Region
Trade Unions/Labour	Canadian Building Trades Council (CBTC) Resource Development Council (RDC) All member Unions

Training Organizations	College of North Atlantic (CNA) Private Training Institutions Memorial Gardiner Institute Labrador Institute Union Training Institutions
Training Partnerships and Funding Organizations	Labrador Aboriginal Training Partnership (LATP) Aboriginal Skills Enhancement Training Strategy (ASETS) agreement-holders Atlantic Canada Opportunities Agency (ACOA) Human Resources and Development Canada (HRSDC) Human Resources Labour and Employment (HRLE) Indian and Northern Affairs Canada (INAC) Health Canada (HC)
Other Industry	Vale Inco Hebron Iron Ore Company of Canada Wabush Mines New Millenium Palladin (Aurora Energy)

The consultations took place in two stages:

One-on-one consultations from March to May 2012

Focus group consultations on May 15, 2012, in Happy Valley-Goose Bay, and on May 16, 2012, in St. John's.

LCP is considering the information exchange with these groups in finalizing the Gender Equity and Diversity (GED) Program (Program), and in developing respectful workplace and labour acquisition standards. The feedback will also be considered in developing specific and measurable annual targets.

B. SUMMARY OF CONSULTATION FEEDBACK

Throughout the one-on-one and focus group consultations, organizations recognized LCP for taking an early and proactive approach to developing a gender equity and diversity program. Most agreed that a good framework is in place and the focus should now be on setting targets and pursuing actions that will give meaning to the policy statements. The comments and recommendations heard during consultations can be broadly summarized into six major themes:

Detailed targets: There must be clear and direct targets set to implement the Program. While the policy framework provides all the right language, the program can only be successful if it is specific and measurable, and if it sets minimum targets that must be met by all.

Monitoring and enforcement: Positions must be created and given the authority and information needed to coordinate, monitor and enforce compliance with LCP's gender equity and diversity requirements, from the primary contractor through to all levels of sub-contractors.

Training: LCP must coordinate the delivery of many levels of training, including essential workplace skills such as worksite readiness, cultural awareness, and gender equity and diversity awareness. Training will be the key to success for the Program.

Comprehensive communication loop: Communication on the Program must be thorough and reach all levels, from the main contractor through to all sub-contractors. Supervisors and managers are a critical link in the communications loop since they will be instrumental in implementing the program.

Small business supports: To ensure access to LCP work for businesses owned by underrepresented groups, early, accessible and clearly-written information on how to participate is important.

Continued consultation and cooperation: Organizations with a vested interest in gender equity and diversity can share information and advice that will support the ongoing implementation of LCP's Program. It is important that LCP create processes to facilitate an ongoing relationship.

Stakeholder support

During the consultations, groups expressed an interest in supporting LCP's GED policies and targets for the Project. They offered to stay actively involved in consultations, to share expertise in specific areas related to the Program, and to use their distribution networks to reach members with messages and information about LCP's gender equity and diversity initiatives.

C. SUMMARY OF ONE-ON-ONE CONSULTATIONS

During March, April and May, LCP met one-on-one with several organizations representing women and underrepresented groups to discuss a draft concept version of LCP's Program.

The goal was to stimulate discussion and ask representatives to advise and make suggestions on any major gaps or additional measures needed to improve the Program. One-on-one meetings were held with:

Innu Nation

Sheshatshiu Innu First Nation (SIFN)

Mushuau Innu First Nation (MIFN) - Natuashish

Nunatsiavut Government

NunatuKavut Community Council

Labrador Aboriginal Training Partnership

Miawpukek First Nation – Conne River

Qalipu Mi'kmaq First Nation

Newfoundland and Labrador Organization of Women Entrepreneurs (NLOWE)

Women in Resource Development Corporation (WRDC)

Office to Advance Women Apprentices (OAWA)

Coalition of Persons with Disabilities

Canadian Hard of Hearing Association

Partners for Workplace Inclusion Program (PWIP)

Women in Science and Engineering

Association of New Canadians

Provincial Advisory Council on Status of Women

Mokami Status of Women Council

Libra House

Women's Policy Office

Office of Immigration and Multiculturalism

While there was positive response to the Program, groups offered the following comments and insights:

In addition to communicating goals and targets to contractors and labour organizations, these goals and targets should also be shared with women's organizations.

With regard to mandatory training in gender sensitivity, diversity, equity, respectful workplace and inclusion, several groups strongly recommend this training occur **prior to arrival at site**.

For complaints on site, a Shop Steward/HR person should be on site as a key person to ensure the complaints process is fair and equitable.

An LCP/EPCM Diversity Coordinator is also needed on site.

Targets and goals for women's employment must be tied to specific training initiatives – this can help with the ratios.

Can data from the LCP database regarding women employed/ applied/etc be made available to other groups?

Nalcor should consider offering a "refresher" workplace training program, specifically for HEOs, but for others as well. In some cases, women are a few years removed from the workforce and/or training and need to refresh their skills.

The Project should employ female supervisors/shop stewards. In addition, there should be more than one woman per work crew/team.

Groups should be sent notification when job advertisements are ready to hit the various media - groups can distribute to their respective networks.

Nalcor should consider establishing a committee of owner/contractors/union to meet regularly to discuss GED issues.

More information is needed regarding contract award and expenditures to women-owned businesses.

Regarding self-identification of disabilities, it was suggested that upon hiring, people should be asked if they need any special workplace accommodations. This might lead to a better understanding of any disabilities and allow the necessary workplace modifications to occur.

For persons with disabilities, flexible work schedules would be welcome, to allow individuals to deal with issues as they arise. There is no control over the timing of when a disability issue arises.

There should be a special focus on youth in all underrepresented groups.

Setting goals and targets are important, but creating a culture is more important. The results will then come.

Community groups should participate in identifying joint projects; they can help report on progress on various issues.

Parental leave/flexible work schedules are important and need to be geared towards men as well. It allows women the flexibility to work in construction.

Cultural awareness training needs to be delivered similar to safety training, with the same importance and scope.

Innu from both Natuashish and Sheshatshiu highlighted several issues, most of which are addressed via provisions contained in the Impact and Benefits Agreement (IBA). Issues needing special consideration include addictions and communications/language.

Innu liaison positions are needed on-site and must be visible in order to be effective.

Local Labrador contractors who successfully obtain work need to be more progressive in hiring women and Aboriginal people.

It is important to explain to new workers the process of when there may be a layoff and the sequence of events that follows.

D. SUMMARY OF FOCUS GROUP CONSULTATIONS

In May, LCP held two focus groups to gather input on the proposed Program. Each session was three and a half hours long and was led by an external facilitator. Both sessions inquired into three areas:

What is your reaction to the proposed GED Program? (*Sub-questions: How will it impact your group and members? Do you perceive gaps that need to be addressed before the program is finalized?*)

What are your recommendations for implementing the Program?

How can your organization support implementing the Program?

Happy Valley – Goose Bay: May 15, 2012

The following 14 participants attended the session held at Hotel North:

Name	Organization
Cyril Peach	Coalition of Persons with Disabilities
Theresa Hollett	Nunatsiavut Government
Francine Couture	Nunatsiavut Government
Tim McNeill	Nunatsiavut Government
Michelle Kinney	Nunatsiavut Government

Betty Morris	NunatuKavut Community Council
Jennifer Hefler-Elson	Labrador Friendship Centre
Karen Natrass	Labrador Aboriginal Training Partnership
Keith Jacques	Labrador Aboriginal Training Partnership
Jennifer Taylor	Aboriginal Affairs and Northern development Canada
David Massie	Canadian Hard of Hearing Association
Theresa Gregorie	Sheshatshiu Innu First Nation
Amanda Hill	Sheshatshiu Innu First Nation
Shirley Penashue	Sheshatshiu Innu First Nation

Reaction to the proposed Gender Equity and Diversity Program:

The Program says all the right things and uses the right language, but LCP needs to move beyond words and make commitments that are specific, relevant and easy to understand for everyone involved. It's important to use plain language and provide practical examples.

The labour supply is very short. This will be a challenging Project.

The Program will need buy-in at all levels. Monitoring and accountability are critical.

How will commitments in the IBA be reflected in the GDE policies?

LCP needs to consider the rating that will be used in the bid process. There needs to be a strong requirement for reporting and acting on GED policies and practices. It can't be an option to skip these practices and get away with it.

Monitoring and enforcement must be diligent. The further things get from LCP (out to contractors and sub-contractors), the harder it will be to monitor adherence to policies.

The language used in contract documents is critical. It must be specific and clear.

A full communication loop, bringing together all stakeholders, must be honoured.

Supervisor engagement is critical on all areas, including cultural sensitivity. If supervisors are not aligned with the policies, the program will not be effective.

Continued consultation is needed.

We must learn from the experience of other major projects, particularly Voisey's Bay. Get the Program right before construction begins; otherwise the program will continually play catch-up to fix mistakes. The best method of enforcement is through financial penalties. Communication has to be diligently managed from Project owner to contractor to sub-contractor (top to bottom approach). Without this communication, policies and procedures are lost. Provide a safe and private accommodation for women, right from the beginning of the Project. The full loop of accountability and communication is essential.

Recommendations for implementing the program:

Minimum targets: Set and enforce minimum targets on gender equity and diversity. Provide documentation to all contractors. Require contractors and sub-contractors to keep a paper trail of applications received. This will be proof of compliance with hiring protocols and minimum targets.

Contractor communication: Communicate gender equity and diversity to all contractors and sub-contractors, creating a full communication loop. Include hiring managers, unions, site supervisors, shift managers, etc.

Zero tolerance: Ensure policies are enforced at a practical level and cover all aspects of harassment: intimidation, sexual harassment, cultural/racial/gender harassment, bullying, etc. Zero tolerance will lead to a respectful workplace.

Tendering packages: Include information on workforce availability and contacts of organizations that can support meeting GED goals. This can be summarized as a one-pager for the tender package. Include a hiring checklist “have you done...?”

Monitors: Establish independent monitors on Project worksites. They must have open access to information. This may work best with a monitoring team versus an individual monitor.

Training: Deliver training in communities wherever possible. Offer basic (high school equivalency) and workplace readiness workshops, such as worksite orientation, social impacts preparation, etc. Courses such as these will help avoid culture shock for people starting new jobs on the Project and for families left at home. LCP also needs to support apprenticeship training. Introduce a professional development officer position to monitor and support training.

Family supports: Consider childcare needs more broadly (on site and in communities). Consider offering accommodations onsite for married couples.

Accommodations: Specific groups need to be considered and accommodated – women, disabled, pregnant women, etc.

Small business: Large contracts need to be broken down into manageable sizes for smaller businesses, enabling them to bid. Businesses need early information on what will be required so they have time to get ready.

Consultation: Stay connected with stakeholders. Implement a more formalized process, such as working groups on specific issues, to work together to ensure the best GED program possible. Prior to finalizing the GED policy, share the draft with stakeholders. Reach out to groups not yet involved in consultations.

Cultural and language considerations: Ensure the GED program allows flexibility for cultural practices and celebrations. Ensure clear, language-appropriate signage on worksites.

Hiring preferences: Ensure that those who meet multiple criteria receive a higher ranking in the hiring process.

How stakeholder organizations can help implement the program:

We can work with LCP on sensitivity programs and orientations. We can provide, for example, cultural content.

We can increase awareness of all initiatives among our members, using our own distribution networks.

We can work with our members to educate them on the fundamental aspects of gender equity and diversity; we can help them understand what’s acceptable and what’s not. We can communicate the concept of equality.

As stakeholders we can provide content to include in tendering package.

We can help disburse job ads and educate members on GED policies and requirements; this will help hold contractors accountable to the policies.

Our organizations can create parallel positions to work alongside Nalcor’s GED monitor to ensure optimal monitoring and reporting.

We can help LCP find the right training partners.

We can take part in an Advisory Group to help on specific areas such as apprenticeship training.

St. John’s: May 16, 2012

The following 18 participants attended the session in St. John’s:

Name	Organization
Kristy Hoddinott	NLOWE
Karen Walsh	Office to Advance Women Apprentices
Krista Hickey	Office to Advance Women Apprentices
Gloria Montano	Women in Science and Engineering
Linda Ross	Provincial Advisory Council of the Status of Women
Jessica Gallant	Provincial Advisory Council of the Status of Women
Robin Grant (and co-worker)	Association of New Canadians
Nellie Burke	Office of Immigration and Multiculturalism
Keith Goulding	Qalipu Mi’kmaq First Nation
Peter Dawe	Qalipu Mi’kmaq First Nation
Tracey House	Miawpukek First Nation
Sheila Ryan	St. John’s Status of Women’s Council
Tanya Noseworthy	Government of Newfoundland and Labrador, Department of Natural Resources
Lori LeDrew	Partners for Workplace Inclusion
Michelle Clarke	Partners for Workplace Inclusion
Nicole Kielely	Women in Resource Development
Juanita Cutler	Women in Resource Development
Nicole LaBossiere	Women in Resource Development

Reaction to the proposed Gender Equity and Diversity Program:

What we’re talking about is culture change in a short timeframe. What’s the goal? To complete the Project on time or to do business differently? The GED policies could make this Project different.

This policy represents the new rules of engagement. It’s not just a nice-to-do anymore. Nalcor has an opportunity to complete the Project on time and set a new model for doing business differently.

The framework contains some strong impressive elements but will there be enough change in construction’s normal way of doing business. For example, will it be possible for a single mother to participate?

There seems to be evidence of good consultation but the door is still closed in some ways. It seems Nalcor often presents the finished document with no further consultation.

An important phrase in the agreement is “continuous improvement” – this is essential to long-term success.

There are many great positive comments but the devil is in the details. We are in an abstract position right now.

We seem to be in a state of positive skepticism. There is concern that LCP has not been as free-flowing with information as it appears. Example: lack of participation in the NLOWE conference and ANC symposium.

We need to know specific employment numbers; this information is critical, especially from a training and readiness point of view. Example: Qualipu has 23,000 members - in order to participate, information is needed to help them prepare for opportunities.

We are in the midst of cultural change. The province has come a long way but LCP needs to be realistic about what’s achievable. Look at low-lying fruit. How can LCP set an example? Be reasonable with short and long term goals.

Every Project has a unique opportunity to set an example. This is an opportunity for Nalcor to set a new best practice.

We are seeing big change in this province – policies and structure and participation is getting better.

We need a commitment to results versus a commitment to action. The focus needs to be on what plays out at the ground level.

We have a five-year window. This can be a model GE&D program. Community organizations must also take responsibility for pushing back and demanding change. Look at the RNC example – what if LCP were given a human rights exemption on targeted hiring?

What happens after five years? Do we need a broader perspective, industry-wide, on how we train people and keep them employed in this province in the long term?

There seems to be organizations missing in the conversation – labour and union groups, for example.

We need to address the perception of Newfoundland in international circles - we may need to look far and wide for Project recruitment.

We need an independent monitor on this Project.

Why was this program not in place prior to the start of preliminary works? We (stakeholder organizations) need to be able to prepare our members; we can’t do this without information.

Recommendations for implementing the program:

Specific targets: Provide more information on the Program with regard to monitoring and enforcement. Details are needed beyond the policy framework. An independent monitor (specific to GED) is needed for the entire Project to ensure policies and targets are met.

Childcare: Hire early childhood educators to support families in communities but also on worksites, enabling workers to bring their small children to job sites. Pay these workers well. Support small businesses in opening childcare operations. Consult with workers and their families in developing the childcare strategy.

Minimum GD&E targets: Clearly communicate specific targets. Consider developing policies and practices that will support sustainable employment. A coordinated industry-wide approach is needed. Regarding procurement, the GED requirement needs to be stronger and have more importance in terms of minimum requirements and the weight that meeting these standards will be given in the tendering process.

Database: We need industry-wide access to information on women working in non-apprenticed trades. The GED Program is a good opportunity for Nalcor to spearhead this collaboration.

Hiring: Seek to hire and contract those who are already committed to diversity, versus hiring with an intention to train.

Disability: This needs to be reflected more strongly in the policy framework. It seems to be missing. A key issue for the disabled is feeling safe to disclose their disability. The disability must be acknowledged and accommodated. The current plan feels more reactive than proactive regarding disability.

Recruitment: Tap into all available pools of diverse talent. International recruitment needs to be reflected in the planning; labour shortages in the province will demand this.

Communication and consultation: Nalcor must share its GED results with stakeholders. We need to hold more meetings like this focus group but include more groups, such as unions. Think broadly about consultations for the benefit of industry. Need to participate in more front line sessions with stakeholder groups, providing information to members. Circulate the policy draft to a broad selection of stakeholders to gather feedback before finalizing it.

Best practices: Learn from the gender equity and diversity practices in Long Harbour. They are seeing good results.

Language: User-friendly language is needed in recruiting suppliers and employees. This is a complex Project and it can't be assumed that people understand the complex language – it can be a barrier to participation.

How organizations can help implement the program:

We can support GED communication by getting information out to our members – we can use our distribution networks.

We can help access funding and link to opportunities that are already in place, such as in the area of childcare.

We can share our database information to support a larger industry employment database. We can also contribute to the analysis involved in setting annual GED targets and assessing results.

We can support training initiatives, such as diversity training, welcome-to-the-workplace training, etc. Some of these programs are already available.

Work with us on international opportunities. There are several organizations with expertise in the area.

Work with our existing certification programs, such as WE Connect, to support the women's targets.

We can provide expertise in assessing work sites from diversity and culture perspectives. This will help accommodate culture-specific areas, such as Aboriginal ceremonies.

Gender Equity & Diversity Focus Group Invitation List

Happy Valley-Goose Bay Invitation List	
Organization	Contact Person
Women's Resource and Information Centre (Labrador West)	Noreen Careen, Coordinator
Labrador West Status of Women Council	Noreen Careen, Executive Director
Mokami Status Of Women Council	Petrina Beals, Coordinator
Labrador Regional Coordinating Committee – Violence Prevention Labrador	Carmen Hancock, Coordinator
Libra House	Janet O'Donnell, Executive Director
Mud Lake United Women's Group	Vyann Kerby
Labrador Friendship Centre	Jennifer Hefler-Elson, Executive Director Denise Cole, Homelessness Coordinator
Labrador West Association for Community Living	Tony Lawrence
Lake Melville Community Employment Inc. (persons with disabilities)	Donna Roberts, Executive Director
Labrador Aboriginal Training Partnership	Keith Jacque
Hope Haven Inc.	Marsha Power Slade
Sheshatshiu First Nation	Amanda Hill Theresa Gregorie Shirley Penashue
Mushuau Innu First Nation	Angela Pasteen
NunatuKavut Community Council	Dorothy Earl
Nunatsiavut Government	Rexanne Crawford, Deputy Minister Finance, Human Resources and Information Technology
Human Resources Labour and Employment	Erica Stockley
Aboriginal Affairs and Northern Development Canada	Jennifer Taylor
Inuit Women	Myrtle Banfield
Coalition of Persons with Disabilities Newfoundland and Labrador	Cyril Peach

St. John's Invitation List	
Organization	Contact Person
Woman's Policy Office	Heather McLellan, ADA
Newfoundland and Labrador Organization for Women Entrepreneurs	Paula Sheppard, Executive Director
Office to Advance Women Apprentices	Karen Walsh, Executive Director
Women in Resource Development	Charmaine Davidge, Executive Director
Women in Science and Engineering	Gloria Montano, President
Multicultural Women's Organization	Kaberi Sarma-Debnath, Executive Director
Provincial Advisory Council on the Status of	Linda Ross, President

St. John's Invitation List	
Organization	Contact Person
Women	
Newfoundland Aboriginal Women's Network	Sheila Robinson, President
St. John's Native Friendship Centre	Karen Miller, Women's Program Coordinator
Association for New Canadians	Bridget Foster, Executive Director
Office of Immigration and Multiculturalism	Nellie Burke, Director
Federation of Newfoundland Indians	Brendan Sheppard, Executive Director
Qalipu	Keith Goulding
Miawpukek First Nation – Conne River	Mi'sel Joe, Chief Tammy Drew, General Manager
St. John's Native Friendship Centre	David Penner, Executive Director
Coalition of Persons with Disabilities Newfoundland and Labrador	Michele Murdoch, President
St. John's Status of Women's Council & St. John's Women's Centre	Leslie MacLoud
Department of Natural Resources	Tanya Noseworthy
Department of Education – Apprentices Registration	Cliff Mercer
Partners for Workplace Inclusion	Sandra Whiffen, National Manager
Division of Institutional Services	Candice Ennis-Williams, Director

Appendix C Relevant Resources

- ABC Literacy Canada. *“Key Success Factors of Workplace Literacy and Essential Skills Programs.”* Adapted from **Profiting From Literacy**. Ottawa: Conference Board of Canada.
- Aboriginal Construction Careers. (2012). **Aboriginal Construction Careers Toolkit**.
- Alberta What Works. (2012). **AWPI Toolkits for Employer: Making Aboriginal Employment Work for You**. Edmonton: Author.
- Armour, Nan; Carmody, Cat; and Clark, Donna. (2006). **In The Picture: A Future with Diversity in Trades, Science and Technology: Volume Three**. Halifax: Hypatia Association.
- Canada Public Policy Forum. (2012). **Building Authentic Partnerships: Aboriginal Participation in Major Resource Development Opportunities**.
- Canadian Apprenticeship Forum and Aboriginal Apprenticeship Board of Ontario . (2012). **Aboriginal Supply and Construction Demand**. Ottawa: Author.
- Canadian Apprenticeship Forum. (2011). **Employers and Apprenticeship in Canada**. Ottawa: Author.
- _____. (2009). **Workplace Accommodations for Persons With Disabilities in the Skilled Trades**. Ottawa: Author.
- _____. (1998). **On the Job Training for Aboriginal Apprentices: An Information Guide Prepared for Employers, Apprentices and Journeypersons Involved**. Ottawa: Author.
- Canadian Council on Social Development. (2004). **Workers with Disabilities and the Impact of Workplace Structures**. Ottawa: Author.
- Child Youth and Family Services. (2012). **Family Child Care Information Package for Potential Family Child Care Providers**. St. John’s: Government of Newfoundland and Labrador.
- Clark, Donna; Martell, Anne; Wentzell, Becky; and Wheaton, Margo. (2009). **On the Level: Women Working in Trades and Technology – An Employers Guide to Creating Respectful Workplaces**. Halifax: Hypatia Association.
- Conference Board of Canada. (2012). **Understanding the Value, Challenges and Opportunities of Engaging Metis, Inuit and First Nations Workers**.
- Conference Board of Canada. (2010). **Optimizing the Effectiveness of E-Learning for First Nations**. Ottawa: Author.
- Construction Owners Association of Alberta. (2011). **Workplace Respect Toolkit: A Best Practice of the Construction Owners Association of Alberta**. Edmonton: Author.
- Construction Sector Council. (2012). **Construction Looking Forward: National Summary 2012 to 2020**. Ottawa: Author (now known as BuildForce Canada).
- _____. (2012). **Women In Construction Engagement Strategy**.
- _____. (2010) **A Workbook for Aboriginal People Interested in Employment in Construction: How to Present Your Skills and Experience to the Construction Industry**. Ottawa: Author.
- _____. (2010). **The State of Women in Construction in Canada**. Ottawa: Author.

- Dalton, Rick. (2008) **Aspect: A Successful Promotion of Equity in the Construction Trades.**
- Disability Policy Office. (2010). **Inclusion for All: Consultations to Develop a Plan to Remove Barriers for People with Disabilities in NL.** St. John's: Government of Newfoundland and Labrador.
- ECO Canada. **Aboriginal Recruitment Guide.** Calgary: ECO Canada.
- Electricity Sector Council. (2009). **Aboriginal Symposium Findings: Aboriginal Engagement Initiatives Project.**
- Executive Council. (2007). **Planning for Gender Equitable Employment.** St. John's: Government of Newfoundland and Labrador.
- Finnish Institute of Occupational Health. (2008). **Occupational Health and Safety for Women: Some Critical Issues.**
- Forastieri, Valentina. (2000). **Safe Work: Information Note on Women Workers and Gender Issues on Occupational Health and Safety.** Geneva: International Labour Organization.
- Government of Newfoundland and Labrador. (2008). **Policy on Multiculturalism.** St. John's: Author.
- Government of Newfoundland and Labrador. (2008). **Employers Guide to Hiring Immigrants and International Students in NL.** St. John's: Author.
- Government of Nova Scotia. (2012). **Welcoming Workplaces: Successful, Diverse and Inclusive.** Halifax: Author.
- Husky Energy. (2008). **2008 Diversity Plan Report to CNLOPB.** St. John's: Author.
- _____. (2003). **White Rose Project Diversity Plan.** St. John's: Author.
- Indian and Metis Girls Exploring Trades and Technology. (1998). **Choosing The Beat Of Her Own Drum.** Regina: Author.
- Indian and Northern Affairs Canada. (1999). **Job Search Toolkit for Aboriginal Youth.** Ottawa: 1999. Government of Canada.
- Labrador Aboriginal Training Partnership. (2012). **Skills Development: Innovative Approaches to addressing Labour Force Challenges.** Happy Valley-Goose Bay, Labrador: Author.
- McGrath Carmelita. (2000). **Celebrating Diversity: Respecting Differences** St. John's: Women's Policy Office.
- Moore, Jennifer Dawn. (2006). **Women In Construction Management: Creating a Theory of Career Choice and Development.** Thesis (Ph.D.)--Colorado State University.
- Multicultural Women of Newfoundland and Labrador. (2010). **Advancing Immigrant Women's Equality: Comprehensive and Culturally Competent Programs and Services.**
- National Aboriginal Women Association. (2008). **National Aboriginal Women's Summit: Strong Women, Strong Communities.** Ottawa: Author.
- Office of Immigration and Multiculturalism. (2007) **Diversity: Opportunity and Growth – An Immigration Strategy for Newfoundland and Labrador.** St. John's: Government of Newfoundland and Labrador.

- Philpott, David. (2006). **Identifying The Learning Needs of Innu Students: Creating a Model of Culturally Appropriate Assessment.** St. John's: Memorial University of Newfoundland.
- Queensland Government. (2012). **Workplace Protocol Guide for Industry and Employers of Indigenous Queenslanders.**
- Radulescu, Diane. (2009). **You Can Do It! A Woman's Guide to Construction Careers.** Chicago: Women In Trades Chicago.
- Radulescu, Diane and Galarneau, Marian. (2009). **Employment among the Disabled Perspectives.** Catalogue no. 75-001-X. Ottawa: Statistics Canada.
- Smythe, Suzanne. (2012). **Incorporating Digital Technologies in Adult Basic Education: Concepts, Practices and Recommendations.** Toronto: Alpha Plus.
- Sprunt, Eve S. (2008). **Retaining Women in the Oil and Gas Industry.** Calgary: Society of Petroleum Engineers.
- Teachers of English As Second Language. (2009). **Best Practices for Adult ESL and LINC Programming in Alberta.**
- Thompson, Nicola. (nd). **Women in Construction.** Issue 43 . Malvern, Australia: WISE Net.
- Tinto Rio. (2012). **Aboriginal Policy and Programmes in Australia.**
- US Department of Labour Occupational Safety and Health Administration. (2008). **Women in the Construction Workplace: Providing Equitable Safety and Health Protection.**
- Vale Inco Long Harbour Processing Plant. **Women's Employment Plan.**
- Watt-Malcolm, Bonnie and Young, Beth. **Canadian Women in Industrial Trades: A Historical Perspective.** Edmonton: University of Alberta.
- White Ribbon Campaign Canada. (2011). **Engaging Men and Boys to Reduce and Prevent Gender-Based Violence** Ottawa: Status of Women Canada and the Public Health Agency of Canada.
- Wiggins, Cindy. (2000). **CLC Unions Mobilizing for Disability Rights: Disability Provisions in Collective Agreements in Canada.** Ottawa: Canadian Labour Congress.
- Women Building Futures and Construction Owners Association of Alberta. (2012). **Fill the Gap in Your Labour Force: An Employers Guide to Best Practices in Hiring and Retaining Tradeswomen.** Edmonton: Women Building Futures.
- Women in Mining Canada. (2012). **Ramp Up: A study on the Status of women in Canada's Mining and Exploration Sector.** Ottawa: Author.
- Women In Resource Development Corporation. (2010). **Thinking Forward: A Practical Guide to Increasing Women's Participation in The Industrial Workplace.** St. John's: Author.
- Women in Resource Development. (2006). **At A Snail's Pace: The Presence of Women in Trades, Technology and Operations in NL.** St. John's: Author.
- Women In Trades and Technology Newfoundland and Labrador. (1996). **Women, Employment Equity and the Hibernia Construction Project: A Study of Women's Experiences on the Hibernia Construction Project, Mosquito Cove, NL.**

Women's Policy Office. (2007). **Outlook 2020: Newfoundland and Labrador Labour Market**. St. John's: Government of Newfoundland and Labrador.

Appendix D
LCP Site Handbook