

Indigenous Communities and Industrial Camps: Discussion Paper

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Executive Summary

During the negotiation of Pipeline Benefits Agreements in 2014-15, the Lake Babine and Nak'azdli Whut'en First Nations raised concerns regarding the social impacts of proposed industrial work camps associated with the construction of the Coastal GasLink and Prince Rupert Gas Transmission projects. These two projects contemplated the construction of up to 30 camp facilities during the project lifecycle.

In response to these concerns, the Ministry of Indigenous Relations and Reconciliation (MIRR) and the Ministry of Energy, Mines, and Petroleum Resources (EMPR) provided funding to the Lake Babine Nation and Nak'azdli Whut'en to examine the social impacts of industrial camps and to identify mitigation strategies. *Indigenous Communities and Industrial Camps: Promoting Healthy Communities in Settings of Industrial Change* (The Firelight Report), written with the Firelight Group, was submitted in February 2017 to the First Nations Summit. The Firelight Report highlights the negative social impacts that industrial camps can have on nearby Indigenous communities, and in particular on Indigenous women and children including:

- Increased substance use;
- Increased demand for sex work and higher risks of sexual exploitation;
- Increased economic inequality (high wages of workers vs. low wages of Indigenous women);
- Increased costs of living, and food and housing insecurity; and,
- Decreased ability to connect with Indigenous governance and health/wellness practices such as hunting, fishing, berry picking, etc.

The Firelight Report suggests that industrial camps must be managed and operated in a manner that protects and promotes the health and well-being of the employees at the camps and prevents potential negative social impacts on nearby communities and especially on vulnerable populations.

In March 2017, a broad group of both social and natural resource sector Deputy Ministers struck a cross ministry Working Group (the Working Group) to review the report and develop recommended actions. While the Working Group's mandate focussed initially on impacts associated with liquefied natural gas (LNG) pipelines it was quickly recognized that industrial camps are common across the natural resource sector. As a result, the scope of the project expanded to include the impacts of industrial camps province-wide (i.e., camps associated with forestry, mining, and other oil and gas developments), with a focus on Indigenous women and children in northern British Columbia (B.C.). The Working Group identified five priority theme areas where the province could focus its response:

1. Improving camp operations;
2. Increasing understanding and addressing information gaps;
3. Improving awareness;
4. Legislation, regulatory reform and policy tools; and
5. Supporting Indigenous women and children through community funding and social services.

This Discussion Paper provides a summary of the work to date. Concepts in the paper have been developed with input from representatives of Lake Babine Nation and Nak'azdli Whut'en, and was informed by targeted discussions with a number of Indigenous organizations, the federal government, local governments, service providers and industry. The engagement and research to support this paper focused on impacts to Indigenous women and children, predominantly in northern communities and is intended for internal to government review.

Improving the health and well-being of Indigenous women in contexts of rapid industrial development requires actions from organizations outside of the Provincial government (i.e., RCMP, Federal government, Indigenous governments, Indigenous organizations, etc.). The work that informed this Discussion Paper did not focus on actions by other groups, but acknowledges they are necessary partners for change.

Further engagement with Indigenous people and Indigenous women is needed to scope out possible actions for the Province to consider in better managing industrial camps, to support the development of a Provincial Action Plan. Further development of provincial actions will require endorsement by Provincial Deputy Ministers, significant resources and coordination across ministries and further engagement with Indigenous women, Indigenous governments and organizations, industry, external organizations, service providers and local government.

Acronym List

ALP – Aboriginal Liaison Program

B.C. – British Columbia

EA – Environmental Assessment

EAA – *Environmental Assessment Act*

EAO – B.C. Environmental Assessment Office

EMPR – B.C. Ministry of Energy, Mines and Petroleum Resources

ENV – B.C. Ministry of Environment

EVA BC – Ending Violence Association of BC

FLNR – B.C. Ministry of Forests, Lands and Natural Resource Operations and Rural Development

GBA+ - Gender Based Analysis Plus

IBA – Impact Benefit Agreement

ICR – Industrial Camps Regulation

IGBA - Indigenous Gender Based Analysis

KUG – Kemess Underground Mine

LNG – Liquefied Natural Gas

MACIW - Minister's Advisory Council on Indigenous Women

MIRR – B.C. Ministry of Indigenous Relations and Reconciliation

MOH – B.C. Ministry of Health

MOU - Memorandum of Understanding

NWAC – Native Women's Association of Canada

OGC – B.C. Oil and Gas Commission

OHSR - Occupational Health and Safety Regulation

TKN – Tse Keh Nay

TRC – Truth and Reconciliation Commission

STI – Sexually Transmitted Infection

UNDRIP - United Nations Declaration on the Rights of Indigenous Peoples

A. Introduction

Natural resource development is a major economic driver in B.C. that creates good jobs and supports the economy. There are a number of tools and mechanisms that the Province and industry use to assess, plan for and mitigate environmental impacts from natural resource development. However, the way that social and cultural impacts are planned for and mitigated could be improved. Social and cultural impacts are defined as changes to the way people live, work, recreate and/or organize to meet their needs (e.g. an influx of non-resident workers into communities could: put increased strain on limited recreational centres, or activities, such as hiking and mountain biking trails; lead to a higher cost of living for community members through increased costs of goods, services and housing; alter power dynamics or distribution, community attitudes and identity, and local government governance structures;)ⁱ. Social impacts can be directly attributable to a project or can be caused indirectly by a project's activities. Social impacts can be positive (desirable) or adverse (undesirable). Social impacts can be experienced by an individual, a family/household, a social/cultural group or community.

Natural resource development often requires the establishment of industrial work camps (see text box)ⁱⁱ. Industrial camps are established to support remote work sites, where highly mobile and temporary operations are required and when the workforce cannot be sourced locally. Camps are used to house workforces that support forestry activities, energy and petroleum resource extraction, infrastructure and hydro projects, mining and agriculture. Major projects often require industrial camps as important logistical support for both construction and ongoing operations. Housing workers in industrial campsⁱⁱⁱ can be a way to mitigate some of the social impacts of temporary workers on local communities, for example by preventing increased pressure on local rental markets, by providing in-camp amenities to camp residents, and by creating some physical distance between the camps and the communities.

Industrial Camps: are land or premises on which an employer, in connection with a logging, sawmill, mining, oil or gas operation, a railway construction project, a cannery, or a similar thing, owns, operates or maintains, or has established, permanent or temporary structures for use, with or without charge, by employees as living quarters. This could include accommodation or amenities that are constructed and managed by a third-party supplier where resource companies or “employers” rent out large blocks of rooms at these facilities for their employees who work in the area.

The Province and industry actively seek the support of proximate communities for major projects. The Province engages with affected communities to develop strategies to assess and mitigate impacts and enhance shared benefits, and consults with First Nations on decisions that may impact their constitutionally protected rights. Social impacts of industrial camps are inconsistently addressed in current processes. Generally, there is a limited awareness across the private and public sector of how impacts disproportionately affect Indigenous women and children. As a result, many positive initiatives and benefits that stem from resource development projects do not necessarily address or respond to the concerns of these populations. Municipal governments and Regional Districts have also raised concerns about the negative social impacts of industrial camps and the pressures camps can place on local community infrastructure and services.

When industrial camps are located near Indigenous communities, there is an opportunity for Indigenous communities and the surrounding populations to benefit from the industrial activity in the area. The Firelight Report identified several different types of benefits that communities associate with industrial camps including:

- Nation members returning back home to access new employment opportunities;
- Employment and acquisition of new skills;
- New contract opportunities for service operators and subcontractors;
- Increased revenue for businesses, e.g. community gas station;
- Indigenous representation in management of camps or projects can ensure they are planned and implemented with Nation's needs in mind;
- Collective investment in local infrastructure; and,
- Greater cultural understanding.

However, resource development projects can also have diverse impacts on Indigenous communities. Indigenous communities have raised concerns about the social impacts of industrial camps and the impacts camps have on Indigenous women and children.

Ensuring that natural resource development is supported by proximate Indigenous communities and that social, health, cultural, environmental and economic concerns are addressed is an important component of lasting reconciliation with Indigenous peoples. Efforts are required to both minimize potential impacts from industrial camps and maximize potential benefits to communities.

This discussion paper summarizes research and engagement on the potential impacts of industrial camps, and potential actions that the Province can take that are consistent with government's commitment to reconciliation and the implementation of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and the Truth and Reconciliation Commission's (TRC) Calls to Action. This includes developing mitigation strategies, plans and actions with deep and direct involvement of Indigenous peoples and that reflect the *Draft Principles that Guide the Province of British Columbia's Relationship with Indigenous Peoples*.

This paper summarizes issues related to the social impacts of industrial camps under five emergent themes:

1. Improving camp operations;
2. Increasing understanding and addressing information gaps;
3. Improving awareness;
4. Legislation, regulatory reform and policy tools; and,
5. Supporting Indigenous women and children through community funding and social services.

B. Background/Context

This section provides a background on how the Indigenous Communities and Industrial Camps project was developed, context on impacts of natural resource development on vulnerable populations and describes the project's scope.

B.1 Firelight, Lake Babine Nation and Nak'azdli Whut'en report

In 2016, MIRR and EMPR provided funding to Lake Babine Nation and Nak'azdli Whut'en who conducted research to examine the social impacts of industrial camps located near Indigenous communities and identify mitigation strategies. A final report, *Indigenous Communities and Industrial Camps: Promoting Healthy Communities in Settings of Industrial Change* (The Firelight Report), written with the Firelight Group, was primarily informed by a June 2016 workshop which included participation from: Indigenous community members and representatives; representatives from provincial and regional agencies in both social and natural resource sectors; industry; the Highway of Tears Initiative; and, Amnesty International. The report was also informed by interviews with community members, a literature review and dialogue with the provincial government.

The report was publicly released on February 9, 2017 at a meeting of the First Nations Summit. Specific recommended actions included the need for historic trauma training, a review of legislation, reporting and management practices for sexual assault, consideration of gender and community-based impacts in the environmental assessment (EA) process and increased resources for drug, alcohol and mental health

Community Response:

A number of activities were undertaken, including the hiring of Community Coordinators in Lake Babine Nation. Best Practices related to Community Coordinators included:

- Community activities should have leadership support;
- The work needs to start early, as it takes time to build relationships and develop long term trust and rapport in the community;
- Training to help Community Coordinators connect community members to information and resources, and how to provide trauma support to community members is needed; and,
- Other community training, such as violence prevention, elder abuse, anti-bullying and health forums, would also be valuable to both community members and service providers.

Creative initiatives were also undertaken by Nak'azdli Whut'en, who developed harm mitigation strategies for workers at the end of mine shifts. Best practices included:

- Providing supports to families while someone is away at camp;
- Providing supports, including greeters at the mine shuttle stops, for workers returning back to communities from camps; and,
- Taking a harm reduction approach to drug and alcohol use and addiction, violence and abuse.

counseling. Provincial Deputy Ministers created a cross ministry working group (the Working Group) to review the recommendations made in the Firelight Report and to advise and provide feedback on potential government actions.

Lake Babine Nation also received a provincial grant to support the development of a Lake Babine Nation and Nak'azdli Whut'en joint community response to the 2017 Report (see text box on previous page). This funding also supported the Lake Babine Nation and Nak'azdli Whut'en's participation on the Working Group.

B.2 Impacts of natural resource development on vulnerable groups

There is a growing body of evidence that suggests resource-based extractive industries can result in adverse social, economic, and cultural impacts, including impacts on the social determinants of health. These changes can in turn lead to cumulative impacts on the health and well-being of individuals and communities^{iv}. These impacts are complex and shape individual and community experience in diverse ways.

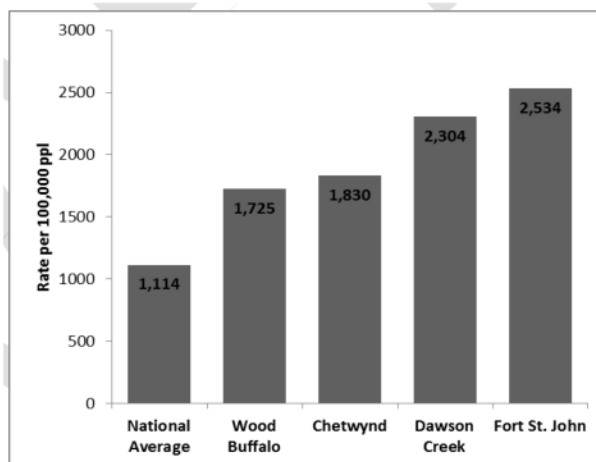
The benefits and costs of resource extraction are not equitably distributed among different segments of the population and disproportionately affect vulnerable groups including Indigenous women^v. Historic

Figure 1: 2015 Police reported Instances of Violence against Women

Note, police reported instances of violence against women are likely to under represent true rates of violence in communities

Source: Statistics Canada- Retrieved from Discourse Media

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and contemporary contexts, including years of colonial policies and practices has created a legacy of social problems that contribute to the challenges faced by vulnerable populations in Indigenous communities. Figure 1 illustrates how women face higher rates of violence in resource extraction communities than the national average^{vi}.

The legacy of residential schools and the imposition of colonial and patriarchal modes of governance and family-making (i.e., how family systems are defined) have led to the suppression of Indigenous culture and Indigenous modes of governance^{vii}. The emotional, physical and sexual abuses that both boys and girls experienced in residential schools have led to trauma being passed on from generation to generation. As a result of this history, Indigenous men, women and children continue to experience systematic discrimination, prejudices and are disproportionately being affected by violence, poverty, and illness^{viii}.

While all portions of Indigenous communities continue to struggle from the effects of colonization, women within Indigenous communities continue to experience disproportionately high levels of violence. For example, while Indigenous women make up only 5 per cent of the female population in Canada, they accounted for 24 per cent of all victims of homicide in 2015^{ix}. Furthermore, Indigenous women are three times more likely to be victims of violence than non-Indigenous women, and those violent situations are eight times more likely to end in homicide^x.

Amnesty International (*Out of Sight, Out of Mind*) and the Firelight Group with Lake Babine Nation and Nak'azdli Whut'en (*Indigenous Communities and Industrial Camps*) have applied a gendered lens to demonstrate the ways resource development can negatively affect Indigenous women and children. These include:

- Increased sexualized violence, domestic violence, sexual harassment, rape, and assault;
- Increased problematic substance use;
- Increased demand for sex work and higher risks of sexual exploitation;
- Increased economic inequality (high wages of workers vs. low wages of Indigenous women);
- Increased costs of living, and food and housing insecurity; and,
- Decreased ability to connect with Indigenous governance and health/wellness practices such as hunting, fishing, berry picking, etc.

These reports conclude that the use of mobile workforces that are disconnected from the region can reinforce and recreate historical patterns of violence against Indigenous women. Industrial camps must be managed and operated in a manner that protects and promotes the health of the employees at the camps and prevents potential negative impacts on nearby communities – especially vulnerable populations.

B.3 Project Scope and Working Group

The Working Group is led by co-chairs from EMPR and MIRR, with the support of two staff (the Project Team). Membership of the Working Group includes representatives from provincial government ministries, a regional health authority, the Minister's Advisory Council on Indigenous Women (MACIW) and Indigenous representatives from the Lake Babine Nation and Nak'azdli Whut'en (see [Appendix 1](#) for membership).

The Working Group was asked to review the Firelight Report recommendations and identify potential government actions. The Working Group had the following objectives:

- Review the Firelight Report recommendations and identify potential government actions;
- Work closely with Indigenous partners to ensure the process, issues and proposed solutions reflect Indigenous perspectives;
- Conduct a gap analysis to determine linkages to existing programs (provincial, federal, and industry) and identify possible gaps and areas for action;

- Provide input to inform the development of a Provincial Action Plan; and
- Identify appropriate stakeholders and industry groups (oil and gas, mining, forestry and local government) to engage and to explore roles and responsibilities.

The Project Team, with support of the Working Group, had targeted scoping conversations from June 2017 to January 2018 with stakeholders and organizations with experience and interest in the issue. An iterative approach was taken, with Working Group members suggesting initial stakeholders and organizations and those individuals suggesting subsequent contacts.

Targeted scoping conversations sought to apply an inclusive Indigenous and gendered lens with focused representation from diverse Indigenous communities and organizations (i.e. Indigenous governments, Métis, on-reserve, off-reserve) and women's organizations. This initial engagement helped to: improve the Province's understanding of existing work and the issue, identify the scope of potential actions and solutions and possible opportunities to collaborate and leverage existing programs. This approach helped to identify priority groups that should be engaged with over the long term for the development of initiatives, programs and potential legislative and regulatory changes.

The Working Group's original mandate focused on understanding concerns and proposing solutions related to the construction and operation of LNG pipelines. However, a broad range of issues emerged around the impacts of all industrial camps. The range of issues is broader than any single industrial sector, takes into consideration the complex historic and contemporary factors that contribute to the vulnerable status of Indigenous women and children and requires an acknowledgment of the complexity of the interrelated factors and drivers. As a result, the scope of the project has expanded to include the impacts of all industrial camps province-wide (i.e., camps associated with forestry, infrastructure and power projects, mining, and other oil and gas developments). The Project Team took an inclusive approach aligned with the principles in UNDRIP and considered impacts and solutions applicable to all Indigenous peoples with a focus to Indigenous women and children living in northern B.C.

While the mandated scope of this project has focused and continues to be primarily on Indigenous women and children, it is recognized that natural resource development can also disproportionately and adversely impact elders, Indigenous men, gender-diverse and two-spirited people and other vulnerable groups. Engagement has also highlighted that initiatives aimed to improve the well-being and safety of Indigenous women and children require men to be part of the solution and should take a holistic and inclusive approach to community development.

Many of the learnings and leading practices identified through research and engagement have the potential to support other vulnerable populations, the well-being of camp residents and Indigenous and non-Indigenous communities impacted by industrial camps as a whole. Given the complex interplays between Indigenous and non-Indigenous communities, on and off reserve populations, social service delivery and social issues in general, the benefits that would be achieved by the recommendations provided in this Discussion Paper have the potential to improve broader overall social and health outcomes.

Many of the issues raised related to improving planning, communication and relationship building are also applicable to non-Indigenous communities. As the focus of this Discussion Paper is Indigenous women and children, and more broadly Indigenous communities, further work is required to determine if recommendations should be broadened to include other non-Indigenous communities.

C. Discussion: What We Heard

This section of the Discussion Paper provides a summary of what was heard from the Working Group, what was heard from targeted scoping conversations and from what was found in relevant research.

Based on this work, the Working Group identified five emergent themes of action:

1. Improving camp operations;
2. Increasing understanding and addressing information gaps;
3. Improving awareness;
4. Legislation, regulatory reform and policy tools; and,
5. Supporting Indigenous women and children through community funding and social services.

C.1 Improving camp operations

Impacts that an industrial camp can have on local communities and Indigenous women and children are influenced by:

- Location;
- Camp culture;
- Communication and community relationships;
- Camp amenities and services;
- Workforce demographics; and,
- Camp policies.

These factors influence worker behaviours off-site and outside of work hours (e.g., when workers are transiting through communities or visiting regional hubs on days off. Worker behaviour outside of the workplace is generally not regulated (see section [C4. Legislation, regulatory reform and policy tools](#)), and is complicated to manage and mitigate, but was an issue that was raised throughout the research and engagement process.

C.1.1 Location

Siting of industrial camps has important social implications for camp residents, workers' families and for proximate communities. Siting decisions are typically based on the physical and geographic features of the area, access to infrastructure and maximizing economic benefits from the influx of workers in communities. For projects that qualify for an EA assessment, First Nations have the opportunity to notify

agencies (i.e., the B.C. Oil and Gas Commission (OGC) in the case of oil and gas development) of any concerns regarding camp location. However, in many cases concerns about the social impacts from locating camps near Indigenous communities are not raised or there is no opportunity for them to be raised in the case of smaller projects that do not qualify for EA assessments.

Being located in remote areas can also influence camp culture. Remote, isolated camps that lack positive social outlets can have negative impacts on the mental health and well-being of camp residents. As a result, as a means to relieve the stress associated with camp life, camp residents returning home or transiting through local communities may respond and behave in ways that negatively impact communities.

A report by the University of Northern British Columbia (2015) suggests increasing camp resident access to local communities can foster improved connections and communications, reduce stigma, enable more positive family dynamics for the camp workforce and enhance economic development opportunities for the community^{xi}. However, not all Working Group members, stakeholders, external organizations and Indigenous representatives and organizations were supportive of increased access. Because there is limited corporate responsibility or regulatory oversight of workers off site, some individuals expressed that access to proximate communities by camp residents should be limited as a strategy to mitigate risk. This illustrates that the siting of work camps is very much situation and community dependent, underlying the importance of engaging early with nearby communities to understand local perspectives, concerns and opportunities before a siting decision is made. Indigenous communities have varying perspectives, and there may be an opportunity to promote peer-to-peer learning between communities already impacted by resource development and those being consulted on proximate future projects.

Industrial camps can have other, indirect impacts on Indigenous communities. For instance, camps can increase camp residents' access to the backcountry resulting in increased hunting and other activities. This activity can have a negative impact on traditional harvesting areas, cultural and other sacred sites. Since Indigenous communities' spiritual, cultural, and social practices are tied to the land base, the presence of an industrial camp can disrupt their ways of life and can have negative impacts on overall health and well-being. In addition, the presence of workers can increase demand, and the cost, for basic necessities in remote communities. Siting decisions, camp locations and policies dictating camp residents' access to proximate communities can help to mitigate some of these impacts.

Factors that industry, with the support of governments and local communities, could use to help address impacts associated with camp siting and location include:

- Including social impact assessments in the planning process for camp siting, design and operations;
- Involving Indigenous governments, non-Indigenous communities and service providers in preliminary discussions and decisions of camp location;^{xii} and,
- Implementing a flexible approach to addressing community concerns throughout the lifecycle of the camp (planning, operations, and post-operations).

C.1.2 Camp culture

Industrial work camps often house male-dominated workforces. The culture of industrial work camps has been described as a hyper-masculine work environment, where sexist, racist and homophobic views are expressed. Although these views may be prevalent elsewhere in society, the nature of camp work, including long stressful hours and time away from families, communities and social norms can create a culture that lacks self-care and collective accountability. This can affect worker behaviour in and outside of camp, and create a culture where sexist, racist and homophobic views go unchallenged. This environment can often feel unsafe or undesirable for women and Indigenous people.

Long work hours, long stretches of work days without days off and the lack of importance put on self-care, also mean camp residents often seek opportunities to release stress at the end of their work rotation. This culture of “blowing-off steam” can lead to significant increases in alcohol and drug consumption and demands for sex work, which are often sought from the surrounding communities or regional centres and transit hubs. In addition, camp culture and operations often lack a focus on well-being; workers with existing or emergent mental health issues may be underserved at the camp and present a pressure on medical services in nearby communities.

Camp culture can result in a number of negative social impacts. These include:

- Increased demands for sex work, which disproportionately affects Indigenous women;
- Risky and inappropriate behaviour;
- Increased substance use (in particular during off-work hours) which leads to increased availability and demand for illicit substances in rural areas; and,
- Decreased volunteerism and social cohesion in host communities where local residents are required to live in camps while working on projects.

The factors contributing to the culture of work camps are not limited to inside the camp itself. Indigenous female respondents to a study conducted by Status of Women Canada identified specific periods of increased violence and abuse against Indigenous women and girls, citing “work holidays or breaks” when transient workers traveled into neighboring towns to “blow off steam and binge drink” and “pay days” when transient workers had cash to spend on alcohol and sex workers^{xiii}. Conversations with the RCMP highlighted increases in crime rates when temporary workers are on break.

Locating camps near Indigenous communities provides an opportunity for cultural learning and reconciliation to occur but must be supported through cultural safety and historical trauma training and proactively developing trusting relationships. This could involve:

- Indigenous communities developing Cultural Competency Handbooks that outline advice and expectations for industries operating near communities;
- Cultural orientation for camp operators to build cultural competencies, including tolerance and respect;

- Training camp managers and employees on historic trauma, colonization and cultural safety (i.e., cultural training to better understand values of Indigenous workers and the ways that camp culture, worker accommodation and shift arrangements might impact these values);
- Providing orientation, education and supports for camp residents in industrial camps which could include:
 - Reporting or speaking up against poor behaviour in camps;
 - Identifying and responding to signs of domestic violence;
 - Addressing and preventing substance use, addictive disease and associated harms;
 - Creating opportunities for intervention and prevention to break cycles of violent behaviour;
 - Identifying and responding to signs of sex trafficking;
 - Identifying and addressing sexual harassment and assault; and,
 - Creating cultural opportunities to build relationships with communities.

C.1.3 Communication and community relationships

The level of communication between proximate communities and industrial camps varies. Municipal governments and Indigenous representatives have both indicated that they are not always informed of the presence of proposed or existing industrial camps. Some camps have limited communication with proximate communities, may not have agreed upon communication protocols, camp policies, and are not required to set up mechanisms to address grievances. Furthermore, when communication and continuous improvement processes (sometimes called grievance processes) are in place through proponents, they may not apply to contractors and other businesses that provide services to the industrial camp or the project.

Initiatives that may help foster good communication between work camps and local communities include:

- Establishing agreed upon communication protocols. Communication protocols between the camp operators and communities should be set out during work camp planning;
- An industry-established process for communities and individuals to bring concerns forward to the operators, sub-contractors and owner of the major project for investigation and follow-up. This should include a grievance and/or continuous improvement process for communities to notify operators of any concerns or incidents. A continuous improvement process could include community advisory panels that provide a forum for community members to identify economic and social issues to operators and that would result in continuous improvement to policies, services or operations;
- Creating and funding social liaison programs in communities to monitor and report issues related to camps to Indigenous government offices (e.g., develop socially focused Aboriginal Liaison Program) and appropriate government agencies; and,
- Funding holistic wellness and safety plans for communities (and potentially for the camps themselves).

Although not the focus of discussions for this project, Working Group members noted that projects can have positive impacts on local communities including: enhanced economic benefits; employment opportunities; and, access to and use of improved infrastructure, services and amenities. Projects often have stringent compliance and enforcement of environmental and safety standards which can contribute to more positive relationships with communities (See best practice text boxes below).

Best Practices: Tahltan Socio-Cultural Working Group

Indigenous communities are seeking to strengthen their capacity to share in British Columbia's economic prosperity. The Tahltan Socio-Cultural Working Group was set up to manage the socio-cultural impacts of the Northwest Transmission Line on Tahltan people.

The Socio-Cultural Working Group (SCWG) approach sets the conditions for innovative systemic change to strengthen First Nation/Indigenous Community strategic and institutional capacity to promote community wellbeing and incrementally improve socio-cultural and economic outcomes for the First Nation/Indigenous Community, its families and citizens. This adaptive framework allows for development and evaluation of work plans on a rolling basis and has expanded to include social and cultural impacts of the Red Chris and Brucejack Mine Projects.

The Tahltan SCWG is developing cultural competency handbooks that will be a guide for employers in the territory. The handbook shows how employers can enhance the opportunities for Tahltan members, so they feel valued at workplaces and will help employers promote and respect the people on whose lands they earn their income.

Best Practices: Collaboration Tables for Major Projects – Kemess Underground Mine

Some First Nations have expressed concerns about the EA process, citing their limited capacity to engage in a technical and time intensive review, the focus on western science, and the lack of decision making authority for First Nations. By changing how the Province works with First Nations on EA reviews, risks of legal challenges are reduced, a more positive investment climate is created, and the Province's goal for reconciliation with Indigenous peoples is supported. One example of this is the collaborative approach that the Province took with Tse Keh Nay (TKN) in the EA process for the Kemess Underground Mine (KUG).

A significant shift in the BC Environmental Assessment Office's (EAO) process was defining the government to government relationship with TKN and reaching agreement on the shared responsibilities of the EAO and TKN, as set out in the Collaboration Plan. Through this Plan, the EAO established co-administration of the EA process and a path for seeking consensus on decisions in the EA. A unique approach to the EAO's assessment was taken, whereby TKN drafted key elements of the EA decision materials related to impacts of KUG on TKN's Aboriginal Interests, a role normally undertaken by the EAO. This ensured that TKN had a voice in the EAO's assessment. During the EA process, TKN raised concerns that were not project-specific and could not be addressed through the EA or subsequent permitting, but were vital to the TKN being able to support further development within their traditional territories.

The Province was responsive to those non-EA interests and created a venue for broader issues (a government to government table), aligning their timeframes with the EA in a way that allowed TKN to have confidence in those issues being addressed. Notably, during the EA process, EMPR and EAO were willing to discuss how issues of concern would be addressed in their subsequent permitting process and began development of a permitting collaboration plan with TKN, modelled on the EAO's collaboration plan. The existing collaborative relationship between TKN and AuRico was key to the success of this approach, providing a good foundation for the EAO and TKN to implement new and creative approaches within this EA.

This new approach resulted in a timely and durable regulatory decision, built trust and confidence for investors and industry, advanced the credibility of the regulatory regime, fostered a more seamless permitting process and demonstrated how B.C. is implementing reconciliation with Indigenous peoples.

C.1.4 Camp amenities and services

The amenities provided at camps are generally driven by a need to attract and retain qualified workers and keep workers in camp. Amenities can include the services that are available to camp residents on-site (i.e., health and medical services) as well as social and entertainment services provided by the operator. All of these amenities can shape worker behaviour off-site and outside of work hours. Non-health and medical amenities that could help limit social, service and infrastructure impacts on neighbouring communities include:

- Regulated wet lounges. Lounges can limit drinking in towns and reduce binge behaviours;
- Wi-Fi and communications technology. The ability to communicate can enable camp residents to remain connected with their home community;
- Recreation facilities. Recreation facilities provide positive social outlets and can function as shared infrastructure and resources for proximate communities.

In addition to camp amenities, services and programs offered on-site can help camp residents to build resistance to work related stress, mitigate effects associated with the camp environment and support mental health and well-being. Camp operators are required to meet WorkSafeBC legislation through on-site health and safety programs. However, these programs do not address risky behaviours outside of the workplace or necessarily translate into amenities to improve overall well-being (see section [C4](#)).

If a project triggers an EA and is awarded an EA certificate, the Environmental Assessment Office (EAO) can require certificate holders to provide certain services and amenities. The EAO often works with health authorities (i.e., Northern Health) to determine the appropriate level of services. In this context, there is an opportunity for community representatives, EA Working Group members, industry or regulators to identify camp amenities that would serve to mitigate potential project impacts. An example of this would be major projects with large camps in the Northern Health region which contain conditions for the inclusion of health service mitigation strategies, such as on-site clinics. For projects outside of the EA process, industry and operators determine the level of services and amenities they are willing to provide at industrial camps (see section [C4](#)).

Camp, services and programs that foster wellness and social connectedness and prevent problematic substance use and associated harms (such as on-site sexual health counselling and education, sexually transmitted infection (STI) testing and/or linkages to these services) can prevent and mitigate impacts to workers, their families and proximate communities and include:

- Employee and Family Assistance Programs. While many companies have access to Employee and Family Assistance Programs, awareness of the programs could be increased as a tool to support workers;
- On-site medical facilities. Camp residents may experience disruption in their access to health services when living in camps and may need to access health services in proximate communities. On-site medical facilities provide continued access to health services for camp residents without impacting proximate community services. On-site health care can also help minimize other

impacts to communities (e.g. by offering sexual health supports, assistance for workers experiencing mental health issues and/or substance use disorders, etc.); and,

- Social programming and activities. These on-site programs should be provided as a positive means of stress relief and to mitigate the psychosocial effects of the camp environment (i.e. a well-equipped gym, sports, bowling, trivia nights, game nights, or hobbies).

C.1.5 Workforce demographics

Industrial camps are often male-dominated. As outlined in section C.1.2, the transient nature of work camps can create a culture of limited individual and collective accountability. There are fewer self-regulating social norms dictating camp behaviours and a culture that can reinforce a lack of self-care. Evidence suggests that the presence of women improves the culture of male-dominated industries. A promising tactic is to create strategies to accommodate and retain women in male-dominated industries. However, work practices and policies make recruitment of women difficult. Limited retention and recruitment strategies for women (duration of shifts, access to childcare, resources and safety supports etc.) contribute to male-dominated camp settings. Supports need to be in place to make industrial camps safe and inviting environments for women.

Improving employment conditions to make industrial work more attractive to female workers could help to address this issue. This could include:

- Introducing shorter shifts to accommodate childcare needs;
- Specific training programs for women;
- Developing strategies to assist male workers to address cultural changes and being more inclusive of women;
- Providing day care services;
- Providing suitable and safe accommodation and bathrooms for women;
- Providing site security; and,
- Equitable hiring practices and anti-harassment policies.

C.1.6 Camp policies

Camps generally have policies that dictate expected behaviour for workers. These policies are developed to address the health, safety and efficient operation of the project for which workers are employed. However, policies do not necessarily consider or reflect the concerns of proximate communities and vulnerable populations.

Companies can demonstrate their expectations about camp culture by setting out expectations through worker codes of conduct that would apply on and off worksites and camps and inside and outside of work hours. A worker code of conduct that applies outside of work hours and outside of work and camp locations could be a mechanism to ensure behaviour in the community is aligned with employer expectations. A worker code of conduct could include social contracts as a condition to residency where

breaches can result in dismissal from employment, or mandatory training and rehabilitation programs. These contracts could set out standards for behaviour and consequences for action set out by a community advisory group. For government contracted camps, a worker code of conduct could be required as part of contract procurement. This requirement could have long term positive effects, for example, in temporary emergency camps, but typically the same contractor is procured every year.

Social Codes of Conduct: The Town of Labrador City has insisted that all workers in camp accommodation sign social contracts as a condition to residency where breaches can result in dismissal from employment. These contracts set out standards for behaviour and consequences for action set out by a community advisory group and are seen to have made a positive difference in worker's behavior (House of Representatives, 2013).

Camp policies have the potential for having large impacts to camp worker behaviour. For instance, providing camp workers a snack on their way home from camp has been shown to reduce incidence of domestic violence over time. Working with researchers, like the B.C. Public Service Agency's Behavioural Insights Group, camp contractors and communities, could help to identify and test changes to camp policies to limit impacts on proximate communities. These tested operational changes could inform the development of best practices.

Other policies could be developed and/or amended to outline clear expectations for camp residents on issues such as:

- Access to vehicles and transit between proximate towns and the industrial camp;
- Alcohol and other drug use;
- Housing requirements (e.g., camp guests, tenancy requirements);^{xiv} and,
- Firearm use and hunting.

Policies that limit worker access to communities are strategies that have been used to mitigate risk when there is little corporate oversight on worker behaviour off-hours and off-site. However, completely cutting off a camp from the community can limit economic benefits for local businesses, increase the social isolation of workers and limit workers' access to social supports. Segregation also does not address institutional racism and does not contribute to improving cultural awareness.

Initiatives that may help address the social impacts of worker behaviours on Indigenous communities include:

- Creating mechanisms for communities to provide input and influence camp policies;
- Engaging early with communities on the design of camp policies; and,
- Creating mechanisms to revise camp policies in response to emerging concerns from the community.

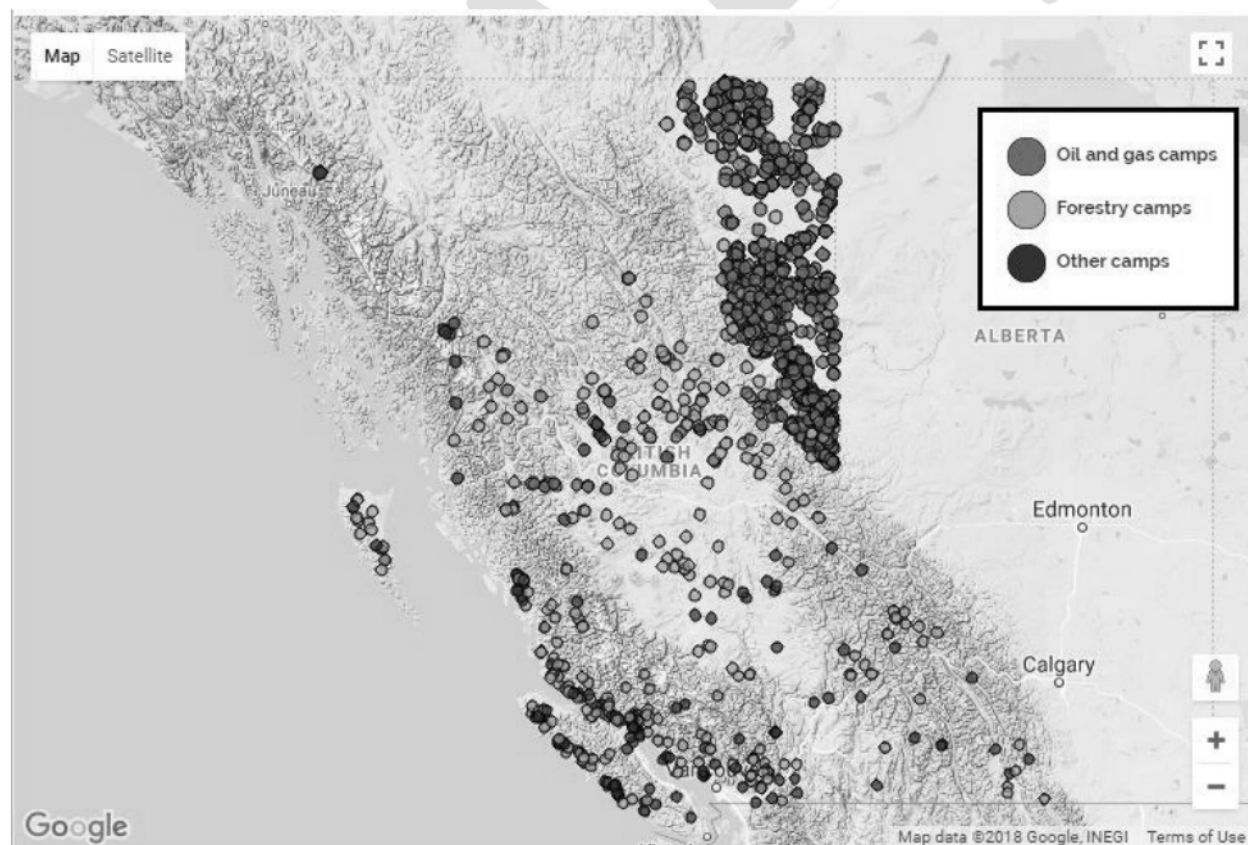
C.2 Increasing understanding and addressing information gaps

C.2.1 Number and location of industrial camps

There is no single agency responsible for tracking and documenting industrial camps in B.C. The OGC, for example, has data on camp applications and permits within their regulatory authority, but their data is not linked to data collected by other agencies. Data is inconsistently collected across sectors, not centralized and can be challenging to track down. As a result, the Working Group was unable to obtain accurate and timely estimates of the total number of camps in operation, locations, number of occupants, whether they are active or their duration of use. A number of organizations have tried to estimate the number of industrial camps in B.C. with estimates varying widely. In 2012, Northern Health estimated there were 1800 camps related to forestry, mining, oil and gas and hydroelectric activities in the Northern Health region.^{xv}

Building off this methodology, Discourse Media (2018) estimated that there were 2000 camps in all of B.C., although they were unable to determine which of these were active (Figure 2)^{xvi}. Recent

Figure 2: Map of industrial camps in B.C. (Fionda, F. & Jones, E.)



information on sewage and waste disposal permits from Northern Health shows there are only 105 active and 6 pending camps with permits in the north, serving up to 9,585 workers, representing about 3% of the permanent population in the same area. This does not include permits for larger industrial camps that would require a permit under the *Environmental Management Act*. This figure is inconsistent

with the estimated 293 camps that have been issued water permits.^{xvii} The lack of consistent data on industrial camps underscores the challenges in identifying the scale of activity and developing appropriate mitigation measures.

Workers can also be housed in hotels, lodges, motels, or other temporary accommodations that are not classified as traditional “industrial camps”^{xviii}. This transient, shadow population is even more difficult to estimate and may have the same or larger impacts on communities due to a lack of industry and corporate oversight and policies to dictate behaviour. These workers are likely to use the amenities and services located in proximate communities and may be driving many of the concerns raised during engagement with service providers.

Developing appropriate actions to assess, plan for and mitigate the potential social impacts of camps and transient workforces requires accurate information, notification and monitoring. It was suggested that government needs to develop a centralized database and notification system to collect, track and share information related to camps and non-resident workforces. In particular, there is limited ability to share and coordinate information on natural resource decisions with the social sector for non-EA reviewable projects. Without additional information (e.g., on the total number of non-resident workers) there is limited ability to understand the cumulative impacts on social indicators, to consider indirect impacts or to conduct regional land use and community planning that responds to the realities of having large proximate camp populations. However, any efforts to coordinate data collection across sectors and notification of camps across the province will require a deeper examination of the ways that camps are currently regulated and permitted.

C.2.2 Social impact monitoring and baseline data

The social impacts of resource development are complex and result in different experiences for different individuals and communities. Standard research approaches may not capture and reflect the range of communities’ experiences. Other approaches may be more appropriate, such as community-based participatory research which is not widely used in policies and decisions related to natural resource projects. Quantitative data has considerable limitations when considering local experiences, yet is often considered superior to qualitative data. Small population numbers make tracking social indicators challenging, particularly with regard to sensitive or confidential health or income information. Social indicators are generally collected and developed externally, without recognizing the right of Indigenous governments to define community wellness, identify relevant indicators and collect, own and manage data.

Access to timely information on social, economic, cultural, natural resource and environmental data is a key component of planning, governance and developing and tracking responses to concerns. The lack of camp data and data on the attributes that contribute to or mitigate their social impacts makes it difficult to determine the impact and identify best practices^{xix}. For example, not having data on how access to services affects worker behaviour makes it difficult to know what services are needed.

The EA process only considers significant adverse impacts on reviewable projects. This leaves limited mechanisms to address the social impacts of camps outside of the EA process, the cumulative impacts of multiple camps, indirect impacts of camp populations or more general impacts of transient workers and boom-bust cycles of resource development (including consideration of broader historical and socio-cultural contexts and vulnerabilities).

While the EAO is currently working to improve the way that social impacts are considered in the EA process, there is a general lack of baseline data on social indicators in communities across the Province. Although a set of social determinants of health have been developed by the Office of the Provincial Health Officer, it has been proposed that greater understanding and evaluation of the social impacts of camps should be developed to ensure that impacts experienced from camps can inform other areas of social policy and programming^{xx}. Social indicators could be developed that reflect community values and could be used to estimate potential social and health outcomes from proposed camps, as well as to inform broader social policy and resourcing decisions. Baseline information and evaluations of a diverse cross section of camps in partnership with communities would be required as without this information, it is not possible to distinguish to what extent social impacts are driven by industrial camps, transient workers or other factors.

Further engagement with Indigenous women, Indigenous leaders, industry associations, industry, contractors, service operators and camp workers is important to deepening understanding of the impacts of industrial camps. While engaging with all these groups is recommended, in particular the Working Group heard suggestions to:

- Engage with Indigenous women. Engagement with the population most impacted is vital to better understanding the impacts of industrial camps. The MACIW could offer advice on how to facilitate focus groups, one-on-one sessions, or other culturally appropriate engagement strategies that are flexible to the needs of individual communities;
- Engage with Indigenous leaders. Engagement with Indigenous leaders is vital to gaining a better understanding of the full range of both positive and negative impacts from industrial camps. This should include a discussion about addressing the social impacts of industrial camps in benefit negotiations; and,
- Hold focus groups with camp workers, their families and camp operators. Industry has a positive perception about changes in camp culture and camp impacts that is at odds with what the Working Group found through discussions with social service providers and other research. Engaging directly with camp workers and operators would inform the understanding of camp culture itself and contribute to actions that will be more successful. Information from focus groups could be used to engage further with unions, worker and industry associations.

C.2.3 Information sharing

There is limited capacity to share information on social data and coordinate responses across provincial ministries and agencies. Information on social indicators is not centralized and is not linked to information on natural resource decisions or extraction or shared with natural resource ministries.

Limited information sharing between these sectors makes proactive planning (including in community and economic development and land use) and responses challenging. There is also limited information sharing on mitigation strategies for social impacts with communities or decision makers in the project proposal phase of the EA process.

The lack of information sharing can create inefficiencies in permitting and compliance and enforcement for camps in some sectors. The B.C. Chamber of Commerce (2014) identified up to 11 different onsite inspections required after a camp is permitted.^{xxi} This can lead to limited coordinated oversight in inspections, a challenge articulating in particular for inspections related to health and safety where capacity to travel to remote locations is limited. Information is not necessarily shared between these various agencies. There is an opportunity to improve information sharing between ministries and other authorities (i.e., WorkSafeBC and Northern Health) by reporting any permitting authorizations and other information about existing or proposed camps.

At the same time, there is a perception that Indigenous communities, service providers, planners and other orders of government are not informed of planned or operating camps in their areas of jurisdiction, in particular for regions with many small operating camps. This limits the ability to proactively plan for the presence of industrial camps and transient worker populations associated with many projects across different sectors.

A regional social impacts risk register could be developed to link camp data (when collected) to existing assets in the region. The potential impacts of heavy industrial activity, multiple industrial activities or several camps in one area could be assessed in relation to existing assets, infrastructure and services. Using this method, “red zones,” where there are high potential impacts from industry, could be identified and could inform community and regional planning.

C.3 Improving awareness

Decision makers, service providers, public servants, industry workers, industry executives and social impact assessors may not understand: the historic and cultural factors that have shaped Indigenous communities (including the ways that social issues have emerged from colonial policies and practices); Indigenous worldviews; or a community’s vision for the future.

The TRC Call to Action 57 calls upon all orders of government to provide education and training to public servants on “the history and legacy of residential schools, UNDRIP, Treaties and Aboriginal rights, Indigenous law, and Aboriginal-Crown relations.” The Call to Action highlights the need for “skills-based training in intercultural competency, conflict resolution, human rights, and anti-racism”^{xxii}. These approaches are equally relevant and necessary for industry executives, management and workers, and are echoed in Call to Action 92 aimed at the corporate sector.

The contemporary and historic realities of Indigenous peoples have resulted in individuals and communities experiencing cumulative trauma from daily stressors of violence, concentrated poverty and historic and structural racism and disenfranchisement.^{xxiii} Frameworks and policies that include a cultural

component and trauma-informed approach grounded in an understanding of Indigenous worldviews and experiences can improve and support community well-being. Trauma-informed approaches are needed for service delivery, training and Indigenous supports and should apply to policy design, community building and engagement processes. Indigenous Gender Based Analysis (see textbox on next page) is one approach that could integrate these considerations into public or private sector decision making processes.

Generally, raising awareness and sharing information has been highlighted as an important tool to ensure existing initiatives better support the needs of Indigenous women and children. It is important that Western and patriarchal governance models do not further or continue to marginalize Indigenous women. Currently, there are visible and invisible barriers to Indigenous women participating in and expressing concerns related to resource development on their territories.

C.3.1 Public Sector

The social impacts of industrial camps experienced by Indigenous communities are affected by broader government policies and decision-making. The Government of B.C. must consult with Indigenous peoples on decisions and actions that could potentially affect their rights. As part of this process, the Province seeks to engage with Indigenous communities and ensure that they share the benefits of projects. Government-First Nation benefits agreements tend to focus on accommodating impacts to rights and title through revenue sharing, land provision, economic development and employment opportunities. Some benefits agreements allocate a portion of funding to address social issues at a high level such as housing, health care, and child and family services. However, agreements generally do not focus on broader social determinants of health, community well-being and anti-violence measures, or on impacts and benefits of projects on Indigenous women and children. These agreements take years to negotiate and implement and may not address preventative issues related to short term camps. Agreements do not consistently identify social issues so there is not a consistent stream of funding for social issues arising from resource development impacts.

There is room to improve the way gendered, health and social impacts (increased risks of violence, sexual exploitation and demands for sex work, increased prevalence of STIs and communicable diseases, or differential wage, employment and affordability impacts) are addressed in EA processes, s.13

s.13

Gender Based Analysis is an analytical tool that uses gender (social identity) as an organizing category and addresses the differences between women and men in a social context.

GBA+ acknowledges that GBA goes beyond sex and gender differences and considers how other factors like race and class, intersect and influence peoples' experiences in complex ways.

IGBA and an Indigenous lens to GBA+ has emerged s.13

assess and mitigate social and environmental costs of projects and increase the benefits of development for vulnerable groups. s.13

s.13

Indigenous Gender Based Analysis (IGBA) is an emerging approach. It begins from the position that colonization has – through a number of approaches and processes, including the forced implementation of patriarchal, Western versions of governance and family-making – contributed to the historic and contemporary marginalization of Indigenous women and gender-diverse people by creating patterns of violence and devaluation that continue today.

s.13

The concept of

IGBA aims to help better acknowledge and understand the historic and contemporary discrimination experienced by Indigenous women and gender-diverse people and engage them in processes that affect their life opportunities.

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reaching to all budgeting, policy, and programming

processes across government for the implementation of GBA+. s.13

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C.3.2 Corporate Sector

The Working Group heard a wide range of input from industry, contractors, service providers and communities. Contrasting narratives emerged about how camps are run and their impact on communities. It was noted that rising commodity prices prior to 2014 created increased competition for skilled labour and that, as a result, a number of initiatives were undertaken to improve the living conditions of workers, with a focus on safety and performance. Consequently, industry contends that camps are addressing the hyper-masculine culture and have become healthier places to work.

However, service providers confirm that many of the same social issues are still present (higher demand for sex work, human trafficking between camps, racism towards Indigenous workers, and increased instances of women and children fleeing violence). There is a need for more detailed and industry specific information about these issues, appropriate processes and mechanisms for response, and effective mitigation strategies.

Many companies, in particular for large projects, actively seek to minimize and mitigate negative impacts and to create, maximize and enhance the socio-economic benefits of project development as a means to gain social license and positive support for projects^{xxv}. Some companies go beyond the Crown's consultation requirements and pursue innovative and collaborative partnerships with Indigenous governments to improve a project's economic outcomes and share project benefits.

Although these initiatives provide important mechanisms to address the social impacts of projects, they do not necessarily apply an Indigenous and/or gender lens. Industry-led initiatives are not necessarily responsive to the needs of the most vulnerable in communities and are not substitutes for social services.

s.13

- Encouraging the application of IGBA lens to Impact Benefit Agreements in order to consider the range of gender and social impacts a camp might have on a community;
- Providing IGBA education and awareness training to industry associations, companies, contractors and service providers;
- Developing Social Impact Assessor professional qualifications, competencies and/or standards that include IGBA training and expertise; and,
- Developing corporate responsibility best practices. Smaller companies or camp contractors may not have the capacity to develop their own policies regarding corporate responsibility and may rely on standards and policies set by leaders in the industry. Government could partner with industry to develop best practices and corporate responsibility agreements encouraging the companies to follow the principles of IGBA.

Industry has an interest in attracting quality employees and the support of local communities that neighbour their operations. Working together to improve how industrial work camps are managed and operated will reduce the negative social outcomes being experienced by Indigenous women and children and provide improved working conditions to attract and retain a qualified workforce.

C.4 Legislation, regulatory reform and policy tools

C.4.1 Current regulatory environment

Industrial camps operate under a patchwork of regulations; with no single authorizing body (see [Appendix 2](#)). There is no single legislative or regulatory authority that is responsible for addressing the spectrum of social impacts of industrial camps on host or proximate communities (Table 1).

The *EAA* requires the consideration of the potential social impacts of proposed major projects, however there is room for improvement in regard to how the impacts identified in this paper are considered. EAs do not typically include the application of a gendered lens to considerations of impacts on vulnerable populations such as Indigenous women, although there are no provisions in the *EAA* that would prohibit the use of such an approach. Table 1 shows that although there are many regulatory touch points with camps, and workers employed in camps, there are few mechanisms to address social impacts outside of consultation with affected Nations and the EA process.

Table 1: Challenges in leveraging existing non-EA regulations to address social and gender impacts

Ministry or Agency Responsible	Legislation/Regulation	Challenge or ability to address social impacts:
Ministry of Health	<i>Industrial Camps Regulation:</i> <ul style="list-style-type: none"> • Focuses on biophysical sanitation requirements (e.g., sanitation, drinking water quality, and safe and sanitary housing) • Applies to camps with a population of 5 or more. Applies to the largest number of camps • Does not require a permit specific to camps, 	<ul style="list-style-type: none"> • May not legally enable considerations of impacts on host communities • Limited/no authority to address mental health, social determinants of health, or well-being of workers and host communities. • Does not include workers housed in lodges, hotels, motels or other temporary accommodations that are not classified as

Ministry or Agency Responsible	Legislation/Regulation	Challenge or ability to address social impacts:
	but camps are required to have permits for drinking water and sewage, if operated independently from any other systems	traditional industrial camps
Human Rights Tribunal	Human Rights Code: <ul style="list-style-type: none"> Provides protection of human rights including provisions against discrimination 	<ul style="list-style-type: none"> Focus on employment, housing etc. not discrimination and racism experienced in day-to-day
Ministry of Labour	Occupational Health and Safety Regulation (OHSR): <ul style="list-style-type: none"> The purpose of the OHSR is to promote occupational health and safety and to protect workers and other persons present at workplaces from work-related risks to their health, safety, and well-being 	<ul style="list-style-type: none"> Limited treatment of mental health and workers' well being No provisions for host communities Limited inclusion of off-duty worker time in camps
Ministry of Labour	Employment Standards Act: <ul style="list-style-type: none"> Ensures that employees in B.C. receive at least minimum standards of compensation and employment 	<ul style="list-style-type: none"> Limited treatment of mental health and workers' well being No provisions for host communities
Environmental Assessment Office	Environmental Assessment Act: <ul style="list-style-type: none"> Enabling legislation Flexible approach to working with Indigenous governments Currently going through a revitalization process that will likely result in changes to the legislation and supporting regulation and policy Developing socio-economic EA process tools 	<ul style="list-style-type: none"> Limited social and health legislation and regulation to inform EAs, direction to proponents and EA certificate conditions Challenges identifying and accessing cross government social impacts expertise to support project working groups Attributing adverse effects to a specific project
Ministry of Environment and Climate Change Strategy	Permits, Environmental Statutes, Land Use: <ul style="list-style-type: none"> See Appendix 2 	<ul style="list-style-type: none"> No framework or obligation to address social issues
Ministry of Energy, Mines and Petroleum Resources	Mines Act The Health, Safety and Reclamation Code for Mines in British Columbia outlines requirements for: <ul style="list-style-type: none"> "lunchrooms and sanitary conveniences," including lunchrooms, toilet facilities, washing water temperatures, piping, etc. exploration camps, generally relating to cleanliness and reclamation. 	<ul style="list-style-type: none"> There are no specific provisions under the Code that outline requirements to consider social impacts Many of the requirements under the Code require compliance with regulations under the jurisdiction of other agencies (e.g. ICR).
Forests, Lands, Natural Resource Operations and	Land Act tenures for work camps are authorized under the following operational policies. For example:	<ul style="list-style-type: none"> Land Act tenure applications for industrial camps are referred to First Nations for consultation on Aboriginal rights and title; this consultation process can also be used as

Ministry or Agency Responsible	Legislation/Regulation	Challenge or ability to address social impacts:
Rural Development	<ul style="list-style-type: none"> • <u>Industrial</u> • <u>General Commercial</u> 	<p>an opportunity to address some of the social issues; i.e.</p> <ul style="list-style-type: none"> ○ the siting location of the proposed camp, ○ A third-party memorandum of understanding between the tenure holder and First Nations community regarding communications etc. <ul style="list-style-type: none"> • The operational policies for industrial and general commercial purposes could reference the policy re: Indigenous Communities and Industrial Camps.
Oil and Gas Commission	<p><i>Land Act</i></p> <ul style="list-style-type: none"> • As a single-window regulator for oil and gas activities in B.C., the OGC has authority to issue permits for related activities under specified enactments, including the <i>Land Act</i>. The application process requires Indigenous consultation, rights holder engagement, environmental and archaeological assessments. 	<ul style="list-style-type: none"> • Involves Indigenous consultation regarding the location of the camp but does not address its continued operation (e.g. sanitation, policies regarding worker codes of conduct or behaviour, policies, health services). Approvals are required from other jurisdictions in order to construct facilities and operate the camp.^{xxvi}

C.4.2 Opportunities for improvement

Regulatory tools could be used in conjunction with non-regulatory tools to compel industry to consider social impacts of their projects and to change the way that social impacts are managed. Compliance and enforcement of any proposed regulations should also be considered as staffing capacity in rural areas, where many camps are located, can be very limited. Adapting regulations and decision-making processes should aim to identify and break down barriers to give a voice to Indigenous women throughout the engagement, consultation, policy development, permitting and decision-making processes.

For example, changing workplace health and safety regulations could also have a positive impact by proactively preventing social impacts, for example:

- Applying health and safety provisions outside of work hours;
- Including provisions related to mental health and worker wellness; and,
- Changing requirements related to the number of hours and consecutive days (drive in drive out/fly in fly out) workers can work.

Provincial and federal commitments to reconciliation and implementing UNDRIP, the TRC Calls to Action, and relevant case law, have led to increased opportunities for shared decision-making for all decision-

making processes in the Province and recognition of Indigenous jurisdiction over their territories and peoples. This change in cross government approach will also need to be reflected in any potential legislative or regulatory changes related to industrial camps. Changing the approach to regulating industrial camps may need to reflect and respond to desires for more community led assessments and monitoring for major projects and other activities. These are long term and fundamental shifts in how industrial camps are permitted; operated and managed that will require long term solutions^{xxvii}.

C.4.2.1 Environmental assessment process

In July 2017, Minister Heyman of the Ministry of Environment and Climate Change Strategy (ENV), received a letter from Premier Horgan with a mandate to revitalize the EA process that will likely result in changes to the B.C. EAA and the supporting regulation and policy:

“Revitalize the Environmental Assessment process and review the professional reliance model to ensure the legal rights of First Nations are respected, and the public's expectation of a strong, transparent process is met”^{xxviii}.

The EAO is planning for a revitalized EA to come into force in the winter of 2019. Through EA revitalization, there is an opportunity to consider whether criteria should be established in the Reviewable Projects Regulation to require EAs for larger worker camps and to identify the appropriate guidance that would be needed to support the consideration of impacts to Indigenous communities in general and women and children in particular. The EAO would also need access to greater expertise on social impact assessment. EA revitalization could also consider changes to compliance and enforcement of EA Certificate Conditions that would support an adaptive approach to responding to community concerns.

C.4.2.2 Industrial Camps Regulation

The Ministry of Health (MOH) is responsible for the ICR^{xxix}, which falls under the *Public Health Act*. The ICR has provisions for the health and safety of work camps and focuses on the biophysical sanitation requirements such as sewage requirements and the provision of safe drinking water. The mental health, social determinants of health and well-being of workers or host communities does not fall under the ICR.

MOH is undertaking a review of the ICR and is considering a broad scope, but it is not yet clear if or how social impacts could be addressed under this regulatory tool.

Health Authorities are responsible for compliance and enforcement of the ICR. Northern Health has highlighted the challenges in meeting current compliance and enforcement requirements, in part due to its large geographic area with extensive resource industry activity, the number of remote and disparate camp locations and data management systems that do not have Geographic Information Systems capability. Environmental Health Officers are trained to inspect biophysical and sanitation conditions and relevant water and food handling permits.

Multi-day travel on remote logging or forest service roads may be required to access a single camp, which the health authority has limited funding and capacity to do for conducting inspections. In addition, addressing social impacts is multi-disciplinary, and may not be fully addressed within the responsibilities of a health authority.

The Northern Health has created a best management guide for industrial camps to create health and medical service plans^{xxx} that go beyond the minimum legislated (*ICR, Mines Act, WorkSafeBC*, etc.) requirements and seek to better address the impacts to local health services associated with increased industrial activities, while also supporting the health of camp workers. The guidance helps to manage not only worker safety risks, but also non-occupational, non-urgent health care service needs, such as primary care mental health services, sexual health supports and health promotion. A Communicable Disease Plan Best Management Guide for Industrial Camps^{xxxi} and additional harm-reduction recommendations for industrial camps^{xxxii} were also recently released as supplemental guidance.

C.4.2.3 Health and safety

The social determinants of health^{xxxiii} are vital factors to reducing the burden of disease and injury and to limiting disparities in health and well-being both between individuals and amongst various segments of the population. Regulations and standards regarding public health and worker safety do not reflect this emerging priority (See [Appendix 2](#) for examples).

The social determinants of health and more holistic definitions of well-being extend beyond the purview of any single regulatory authority (e.g., WorkSafeBC is responsible for safety at work) or Ministry (e.g., MOH, which does not determine employment or social programming) creating challenges to addressing underlying or systemic drivers of health disparity. Factors affecting the well-being of workers in camps have spillover effects on worker behaviour offsite and outside work. These factors are outside of the definition of health and safety as defined by current regulations and can result in negative impacts on Indigenous women and communities in general. There is a need for an expansion of the definition of health and safety to extend to the well-being for workers and to the social determinants of health for the communities that are nearby to industrial camps.

C.4.2.4 Coordinated planning

There are few venues where agencies and ministries can create relationships and partnerships, share information, and collaborate on initiatives related to the social impacts of natural resource extraction and economic development. There are limited opportunities for communities to engage with provincial authorities and industry on issues related to social impacts, and the onus is often on communities to raise and flag areas of concern.

Communities impacted by trauma may have many urgent and immediate needs leading to limited capacity to identify and address problems or participate in planning and engagement processes^{xxxiv}. The current regulatory approach puts the onus on communities, through consultation and engagement, to

identify and flag areas of concern. Communities most impacted by trauma are not well-positioned to flag social issues as areas of concern.

Various planning models were considered to facilitate information sharing within the different provincial entities involved in regulating industrial camps, with other levels of government and Indigenous communities and with industry. These models included Regional Growth Strategies (B.C. Ministry of Municipal Affairs and Housing, FLNR), cross agency Indigenous relations teams, or industry-led socio-economic tables. These venues could be used to communicate with agencies and communities about a proposed camp and to address concerns before, during and after a camp is in operation. Promising initiatives that could integrate information on camps and take an Indigenous gender-based lens includes FLNR's mandate to undertake land use planning processes. MIRR is recreating the interagency Regional Management Committees, which could also be a forum for inter-agency communication on industrial camps.

However, creating planning forums have a number of limitations which include:

- Too narrow or too broad of focus: Planning forums and tables are typically created for a specific purpose and may have too narrow of a focus (i.e., focus only on select social issues or mandates) or too broad of a focus (focusing on social issues among varying other values, such as environmental, economic, land use planning, etc.) unless designed specifically for this issue;
- Lack of capacity: Planning forums and tables are typically created for a specific purpose and may not have the scope of representation required. Many times, the same people and organizations are asked to engage in different tables and experience limitations in their capacity to participate; and,
- Long and costly: Setting up new models that engage all of the necessary sectors and cover the entire province would be a long and costly process.

Convening people in person is costly. In-person, semi-regular meetings may not be appropriate to camps that are small or highly temporary in nature. Large camps, or those associated with large projects are more likely to have the financial and human resources capacity to engage with Indigenous communities and government. Planning tables and processes should therefore be appropriately scaled to the size of camp.

C.4.2.5 Coordinated strategy

Government has a variety of strategies that could be adapted to include planning for industrial camps. For example, the Rural Economic Development Strategy, coordinated by FLNR, seeks to work with rural communities to strengthen resilience, create jobs and build economic opportunities. The Rural Advisory Council and Rural Dividends program supports these goals. Although many of the identified strategies address one or more components or issues related to camps, there is no one over-arching strategy that would be an appropriate fit for the coordination and planning that would be required for industrial camps of all sectors, sizes and locations across the province while incorporating the unique considerations of Indigenous communities and women.

There are a number of existing organizations and government agencies that offer support or prevention services to and for Indigenous women and children. Government could provide funding to increase available supports to managing the impacts of industrial camps. The Community Coordination for Women's Safety run by Ending Violence Association of BC (EVA BC), assists communities to develop new models or improve cross-sector coordination of responses to violence against women. Violence Against Women in Relationships, run by EVA BC; coordinated work with Indigenous communities and across government on the Social Determinants of Health; and, Integrated Case Assessment Teams run by The B.C. Ministry of Children and Family Development are all efforts to improve coordination and policy responses of various sectors and people involved in preventing and responding to violence.

The Aboriginal Liaison Program (ALP), coordinated by FLNR, OGC and EMPR, also links training opportunities and monitoring of natural resource projects with Indigenous communities. Specifically, ALP agencies partner with Indigenous groups to develop liaison and monitoring projects tailored to their interests, concerns, and technical capacity. The ALP supports creating greater Indigenous community awareness of natural resource development, safety, environmental and emergency management, and restoration activities by providing for liaisons within the community. Programs like ALP can be used as a model for addressing social impacts of resource development, focusing on opportunities for community-based responses to violence against women, and other impacts of resource development.

C.5 Supporting Indigenous women and children through community funding and social services

Funding for health authorities and social services (provided by regional authorities, municipalities, provincial agencies, etc.) are determined using information on permanent, resident populations and does not account for higher demand from transient camp and non-camp workers operating in the region^{xxxv}. It has been suggested that camp workers contribute to inequity in health services available to rural/remote populations and that transient workers put a potential strain on available health and social resources when accessing these services^{xxxvi}. Industrial camps and boom-bust resource economies can also put increased demands on particular services (i.e., drug and alcohol counselling, sexual assault response) while rapid swings in economic and demographic conditions associated with boom-bust resource economies can be hard to accommodate, even when funding is available. Widening income inequality, rising costs of living, increased instances of sexual violence and other social impacts in areas of intense resource development also likely result in increased service needs for the permanent population.

Although camps are dispersed across B.C., Northern Health is responsible for an area with a high proportion of industrial activity and camps. This region is geographically large, and work camps are dispersed across large areas. Recruiting and retaining health care professionals to remote and rural areas can be difficult. This can be even more difficult in areas of high industry activity due to the associated high costs of living and competition from industry offering high wages. Ensuring all populations have access to services can therefore be challenging.

As a result, camps that do not provide amenities may place a strain on the proximate community. The additional demand for services created by industrial camps can negatively impact both camp workers' and Indigenous communities' access to services.

Indigenous communities have limited funding and capacity to prepare for, prevent or monitor and adapt to impacts in their communities, including to conduct safety planning, family, financial, harm reduction or anti-violence programming and monitoring related to proposed or active camps in their territories. Limited social programs (beyond employment and training) are available to respond to the social impacts of resource development from a holistic perspective and program funding is often only available on a year to year basis which can limit the effectiveness of program delivery. Allocating resources to communities can enable initiatives specific to local contexts and projects, and have direct positive impacts on people in communities. These investments support the governance and institutional capacity of communities for co-management of the impacts of resource development, and informed co-decision on proposed projects in their territories.

Initiatives that could assist in addressing the challenges associated with the delivery of health and social services include:

- Ensuring that services are designed to maximize the continuity of care for workers. Transient workers should have access to services both during their camp stay and while in their home community;
- Leveraging existing programs and services that support women by offering dedicated long term funding, especially in regions of high industrial activity; and,
- Including social services support in Impact Benefit Agreements (IBAs);
- Developing alternative funding arrangements for health and social service agencies to account for the service needs of non-resident populations and are proportionally allocated dependent on the capacity level of the health authority relative to the volume and scale of the industrial projects in the region;
- Working with communities to identify health and social service needs that reflect the realities of fluctuating impacts of industrial development;
- Providing enhanced funding (from the Province or through industry partnerships) to relevant organizations and entities:
 - Partnering with organizations and entities to provide funding for services in areas of high industrial activity that considers transient populations. Funding for services should be flexible to adapt to rapid fluctuations in transient work populations and increased burden on existing services and infrastructure;
 - Health and social agencies can be well positioned to work with industry, relevant provincial permitting ministries and agencies and indigenous communities to address some of the impacts identified here. However, they often have limited capacity and undefined mandates in this area. For instance, the Northern Health's Office of Health and Resource Development holds relationships with various stakeholders on some of these issues, but their effectiveness and abilities are limited by capacities, often

- requiring them to risk manage between different processes and initiatives (e.g., EA process, permitting, provincial initiatives, etc.);
- Some health authorities have expertise in relation to the impacts of resource development on health and /or key partnerships with academic institutions.
- Making funding available for community preparedness coordinators for Indigenous communities that are in close proximity to large camps. Preparedness coordinators could provide links to existing initiatives and improve coordination, collaboration and information sharing when responding to sexual assault cases (e.g., Sexual Response Assault Teams and Sexual Assault Community Protocols).

D. Conclusion

The social impacts of natural resource development and accompanying industrial camps, including gendered impacts, extend beyond the mandate of any one ministry or agency and addressing them will require a collaborative and coordinated approach. A number of issues were identified by the Working Group and in initial targeted scoping conversations. While there are some issues identified in this paper that individual ministries could address to enhance prevention and management of social impacts, some issues require long term and fundamental shifts in the way industrial camps are permitted, operated and managed. Prioritizing and scoping actions to address these concerns would require dedicated capacity and in-depth engagement to capture the diverse experiences of Indigenous and non-Indigenous communities proximate to industrial camps and to ensure that actions and changes are developed with, and are responsive to, the needs of Indigenous peoples, communities, and industry.

Coordination is needed with priority initiatives already underway across the province (i.e., EA revitalization and development of GBA+ in B.C.). As a cross sector and emergent issue, additional analysis requires a whole of government and iterative approach, in collaboration with Indigenous governments and peoples, industry, municipal and federal governments, and service providers and agencies.

Development of provincial actions will require endorsement by Provincial Deputy Ministers, significant coordination across ministries and further engagement with Indigenous women, Indigenous organizations, industry, external organizations and local government and service providers.

The process in developing this Discussion Paper also identified a lack of understanding of current camp management practices and related corporate policies. Deputy Ministers have endorsed the development of a case study with major project proponents. The intent of the case study is to investigate and inform the Province as to what tactics and best practices can be used for consideration of future regulatory improvements, regarding the planning and operation of industrial work camps in BC. The case study will also provide an opportunity to engage individuals including local government and First Nations representatives, Indigenous women, primary contractors, provincial entities and others as identified that participated in the development of industrial camp planning measures. Engagement will aim to

explore their views on what works well in the current process of planning for industrial work camps, and opportunities for future improvement. The case study will conclude with an analysis of this information and explore gaps and opportunities on how the Province, First Nations and industry can work together towards continuous improvement and identify how concerns related to industrial work camps can be addressed.

The case study also represents a potential opportunity to explore new opportunities for piloting new approaches during the potential construction phases of the proponent's projects.

In addition, Deputy Ministers have endorsed MIRR to continue working with line ministries to articulate, align and leverage activities already underway across government to better consider the social and health impacts of industrial camps on Indigenous communities. Findings from both the case study and MIRR's continued policy scoping work will be presented to Deputy Ministers in early 2019.

Endnotes

ⁱ Aalhus, M. (2018). The social determinants of health impacts of resource extraction and development in rural and northern communities: A summary of impacts and promising practices for assessment and monitoring. Prepared for Northern Health and the Provincial Health Services Authority

ⁱⁱ The definition of industrial camps in the Discussion Paper is based on the definition provided in the [BC Guidelines for Industrial Camps Regulation](#) but differs with the inclusion of accommodations provided by a third party supplier. The ICR specifies it does not apply to third party supplier accommodation or amenities as they are regulated in the same manner as hotels.

ⁱⁱⁱ Workers housed in an industrial camp are referred to as worker residents in this paper.

^{iv} Aalhus, M. (2018). The social determinants of health impacts of resource extraction and development in rural and northern communities: A summary of impacts and promising practices for assessment and monitoring. Prepared for Northern Health and the Provincial Health Services Authority; and, https://www.northernhealth.ca/Portals/0/Your_Health/Programs/Public%20Health/OfficeHealthResourceDevelopment/impacts-and-promising-practices-for-assessment-monitoring.pdf; and, First Nations Health Authority and Northern Health (2015). Health and Resource Development Impacts and Overview; Northern First Nations Caucus Overview of Sub-regional Engagement Sessions, <http://www.fnha.ca/Documents/FNHA-Northern-First-Nations-Caucus-Overview-Fall-2015-Full-Report.pdf>

^v These include positive and negative impacts to employment and income; formal and informal economic activities; work conditions; food security; housing and cost of living; pressure on health care systems; education; connections to the land and waters; cultures; life control, self-determination, and self-governance; social relationships; mental health, substance use, and family dynamics; community safety and crime; sexual health, sex work, and sex trafficking; and gender.

^{vi} Jones, E. (2017). 'No free, prior and informed consent': Rape culture in boom and bust towns. Discourse Media. <http://discoursemedia.org/gender-and-identity/Indigenous-women-violence-resource-extraction> & Jones, E.

(2018) Violence against women in Canada: We have national data, and we're sharing it. Discourse Media.

<https://www.thediscourse.ca/gender/violence-against-women-canada-data-sharing>

^{vii} TRC (2015), as cited in the Firelight Report, pg. 8.

^{viii} The Firelight Report

^{ix} Government of Canada (2018). Budget 2018's Gender Results Framework.

<https://www.budget.gc.ca/2018/docs/plan/chap-05-en.html>

^x Minister's Advisory Council on Indigenous Women,

<https://www2.gov.bc.ca/gov/content/governments/Indigenous-people/minister-s-advisory-council-on-Indigenous-women-maciw/maciw-vision-mission>

^{xi} University of Northern British Columbia. Community Development Institute (2015a): "Lessons Learned in Work Camp-Community Relations: Practices Making a Positive Difference"

[http://www.unbc.ca/sites/default/files/news/40513/lessons-learned-work-camp-community-relations-practices-making-positive-difference/lessons learned in work camp-community relations - final march 2015.pdf](http://www.unbc.ca/sites/default/files/news/40513/lessons-learned-work-camp-community-relations-practices-making-positive-difference/lessons%20learned%20in%20work%20camp%20community%20relations%20-%20final%20march%202015.pdf)

^{xii} Applications for industrial camps under the *Land Act* are referred to First Nations for consultation. This could provide an opportunity to discuss issues with regard to siting location of a proposed camp.

^{xiii} Source: Status of Women Canada. (2014). *The peace project: gender-based analysis of violence against women and girls in Fort St. John*.

https://thepeaceprojectfsj.files.wordpress.com/2014/03/the_peace_project_gender_based_analysis_amended.pdf

^{xiv} This could be linked to a Worker Code of Conduct or serve as a reminder to camp workers renting in town about their responsibilities under the *Residential Tenancy Act*.

^{xv} This does not include smaller, more transient camps that are difficult to track (e.g. exploration, silviculture). With the exception of logging camps, it is not known which camps are active, proposed for future development or retired and inactive. Northern Health (2012). Part 1: Understanding the State of Industrial Camps in Northern BC: A Background Paper.

<http://lginnorthernbc.ca/images/uploads/documents/UnderstandingStateofIndustrialWorkCamps-NorthernHealth-Oct2012.pdf>

^{xvi} This map uses three datasets on DataBC and information provided by FLNRORD replicating Northern Health's Methodology. For more details see Fionda, F. & Jones, E. (2018). In search of Canada's elusive shadow population.

<http://discoursemedia.org/data/canadas-shadow-population>

^{xvii} Northern Health stresses that their information on camps is incomplete and to use these numbers with caution. The data only represents camps that have applied for permits and does not represent the total number of camps in the region or camps that are active.

^{xviii} See <http://lodgeline.com/> for a diverse suite of accommodations used by mobile workforces.

^{xix} Aalhus, M. (2018). *The social determinants of health impacts of resource extraction and development in rural and northern communities: A summary of impacts and promising practices for assessment and monitoring*. Prepared for Northern Health and the Provincial Health Services Authority.

^{xx} Indicators should reference the broader social determinants of health. The Office of the Provincial Health Officer has developed 22 indicators that could be used. Regional Health and Wellness plans developed by First Nations could also inform these indicators.

^{xxi} BC Chamber of Commerce (2014). "Industrial Camps Near or Within Municipalities and their Effects on the Economy." *BC Chamber of Commerce Policy*. <http://www.bcchamber.org/policies/industrial-camps-near-or-within-municipalities-and-their-effects-economy>

^{xxii} Truth and Reconciliation Commission of Canada. (2014). Truth and Reconciliation Commission of Canada: Calls to Action. http://www.trc.ca/websites/trcinstitution/File/2015/Findings/Calls_to_Action_English2.pdf

^{xxiii} Trauma is a set of normal human responses to stressful and threatening experiences.

^{xxiv} The Minister of Environment and Climate Change's Mandate letter includes the mandate to revitalize the Environmental Assessment Process.

^{xxv} Government of Canada (2015). Corporate Social Responsibility (CRS) Checklist for Canadian Mining Companies Working Abroad. <http://www.nrcan.gc.ca/mining-materials/mining/corporate-social-responsibility/17152>

^{xxvi} Approval from Other Jurisdictions for Camps Guidance <https://www.bcogc.ca/node/13338/download>

^{xxvii} For instance, in Australia, multiple parliamentary inquiries at the State and Federal level included widespread engagement and input from industry and expert witnesses to put forward recommendations and, in some cases, new legislation to improve Fly-in-Fly-out and Drive-In-Drive-Out practices across the country.

^{xxviii} <https://www2.gov.bc.ca/assets/gov/government/ministries-organizations/premier-cabinet-mlas/minister-letter/heyman-mandate.pdf>

^{xxix} The ICR applies does not apply to camps with fewer than 5 people and that are established to meet emergency conditions and occupied for a period of not more than 7 days.

^{xxx} https://www.northernhealth.ca/Portals/0/Your_Health/Programs/Public%20Health/OfficeHealthResourceDevelopment/2015-03-HMSP.pdf

^{xxxi} https://northernhealth.ca/sites/northern_health/files/services/office-health-resource-development/documents/communicable-disease-control-BMG.pdf

^{xxxii} https://northernhealth.ca/sites/northern_health/files/services/office-health-resource-development/documents/overdose-prevention-camps.pdf

^{xxxiii} The determinants of health are a mix of social, economic and personal factors that can work together or independently to influence the ability of people to make lifestyle choices, sometimes positively and sometimes negatively. They include income/social status; social support networks; education; employment/working conditions; social environments; physical environments; personal health practices and coping skills; healthy child development; biology and genetic endowment; health services; gender; and culture. From: Provincial Health Officer. Investing in prevention: improving health and creating sustainability. The Provincial Health Officer's special report. Victoria, BC: Ministry of Healthy Living and Sport; 2010 Aug.; and, Public Health Agency of Canada. What makes Canadians healthy or unhealthy? Ottawa, ON: Public Health Agency of Canada [modified 2003 Jun 16; cited 2012 Oct 9]. Available from: <https://www.canada.ca/en/public-health/services/health-promotion/population-health/what-determines-health/what-makes-canadians-healthy-unhealthy.html>

^{xxxiv} Weinstein, Wolin and Rose (2014) argue "trauma manifests at the family and community level by altering social networks and reducing community capacity to collectively identify and address its problems and plan for its future. Trauma can undermine "readiness" for individual and community change" (p.7)

^{xxxv} Note: municipalities in Northeastern BC receive additional funding to compensate for the impacts of resource development. These agreements funded local governments, do not consider the potential gendered impacts or service requirements of resource development and did not explicitly allocate funding for Indigenous service provision.

^{xxxvi} For example, by displacing resident populations through reduced housing availability, access to common services etc. see Northern Health (2015) Health and Medical Services Plan Best Management Guide for Industrial Camps. https://northernhealth.ca/sites/northern_health/files/services/office-health-resource-development/documents/industrial-camps-BMG.pdf

Appendices

Appendix 1: Ministries, Agencies and Organizations represented on the Working Group as of September 2018

- Energy, Mines and Petroleum Resources
- Indigenous Relations and Reconciliation
- Municipal Affairs and Housing
- Advanced Education and Skills Training
- Labour
- Children and Family Development
- Health
- Forest, Lands, Natural Resource Operations and Rural Development
- Public Safety and Solicitor General
- Transportation and Infrastructure
- Environmental Assessment Office
- BC Hydro
- WorkSafeBC
- Lake Babine Nation
- Nak'azdli Whut'en
- Minister's Advisory Council on Indigenous Women
- Northern Health
- Gender Equity Office at Ministry of Finance
- Oil and Gas Commission

Appendix 2: Applicable Regulations to Industrial Camps

Factors determining applicable regulations

Project Size: Thresholds outlined by the *EAA* determine whether a project is reviewable. If yes, social impacts are considered in the EA Process.

Camp Size: Camps over 5 people are regulated by the *Public Health Act* - ICR.

Type of Land: Permits are required for Crown and Agricultural Reserve Land. If projects require land use permits, conditions can be set out for these uses. Camps on Private lands do not require the same permitting.

Local government: Municipal and Regional Districts have the authority develop by-laws impacting camp operations and permit requirements.

Industry: Camps associated with different industries have different requirements, e.g. temporary camps can be authorized through the *Mine's Act*.

Location of Camp in project area: Camps within the Mine Fence Area are under the *Mines Act*, but the *Mines Act* does not oversee bunk houses, which are regulated under the This jurisdictional overlap causes confusion for compliance and enforcement.

Amenities of Camp: Water, food handling, and sewage permits are necessary for camps of varying sizes.

Location of Camp/Land Use on Traditional Territories: Consultation and accommodation with Indigenous governments is required for certain land use decisions.

Discussion of regulations

Industrial camps over 5 people, and not used for emergency purposes are regulated through the *Public Health Act*- Industrial Camps Regulation (*BC Reg 417/83*)¹, which focuses on the personal hygiene, sanitation, and biophysical safety of industrial camps (e.g., dwelling size, availability and specifications of washing facilities, sewage and water). ENV has responsibility or authority under more than 30 statutes, many of which relate to industrial camps (p.66²). FLNR is responsible for issuing permits to mining, forestry, and oil and gas companies operating on Crown Lands for a range of activities such as tenure

¹ Government of British Columbia. REG 417/83. Industrial Camps Regulation- *Public Health Act*. http://www.bclaws.ca/civix/document/id/loo99/loo99/70_2012

² W. Beamish Consulting Ltd. & Heartwood Solutions Consulting (2013). "Policy, communications, capacity: A time to lead. Scoping the impacts and benefits of work camps in the Peace Region" *Prepared for Peace River Regional District*. http://prrd.bc.ca/board/agendas/2013/2013-15-8827692533/pages/documents/4bPolicyCommunicationsCapacity-Atimetolead_June25_001.pdf

and clearing.³ The OGC has authority under specified enactments to review the location of oil and gas camps on Crown Land and issue permits related to tenure and associated environmental considerations.

In addition, projects operating within municipal or regional district boundaries may be subject to by-laws that vary across jurisdiction, making it difficult to compile the necessary permits and licenses a hypothetical project might require. Further variation in the permitting and licensing process is introduced when comparing projects from different sectors. For instance, major mineral developments, and peripherally the camps associated with these projects, are permitted through EMPR, who coordinate a review panel in determining provincial authorization of a project, which differs from oil and gas, which is permitted through OGC. This leads to limited coordinated oversight, challenges with jurisdiction for enforcement and compliance, and inconsistent approaches (see Table 2 for more details on factors determining applicable regulations).

Table 2: Regulations and Legislation Applicable to Industrial Camps (compiled from W. Beamish Consulting Ltd & Heartwood Solutions Consulting (2013); OGC (2016); and BC government staff)

Note: this is not an exhaustive list rather here to demonstrate the number of touchpoints and authorities that can be involved in permitting and oversight.

Regulation/Legislation	Enforcing Agency	Application to Work Camps
<i>Sewage Disposal Regulations (BC Reg 411/85)</i>	MOH Health Protection Branch, Health Authority, Environmental Health Office	Primary legislation applying to all industrial camps >5 people
<i>Drinking Water Regulations (BC Reg 230/92)</i>	MOH Health Protection Branch, Health Authority, Environmental Health Office	Primary legislation applying to all industrial camps >5 people. Drinking water requirements for human consumption, food preparation or sanitation
<i>Food Premises Regulation (BC Reg 210/99)</i>	MOH Health Protection Branch, Health Authority, Environmental Health Office	Primary legislation applying to all industrial camps >5 people, Food intended for public consumption
<i>Public Health Act, Sewerage System Regulation</i>	MOH, Health Protection Branch, Health Authority	If effluent does not exceed 22,700 litres/day or is reused. Camps under 100 people
<i>Environmental Assessment Act</i>	ENV- EAO	When projects are over legislated thresholds
<i>Environmental Protection Act</i>	ENV	E.g., when there is presence of

³ Ibid, p 69.

		or planned industrial waste
<i>BC Electrical Safety Act</i>	Technical Safety BC	
<i>Building Act / BC Building Code</i>	Local governments (where building inspections services exist)	Applies to any buildings other than temporary site offices and seasonal storage buildings. Includes requirements for factory built modular housing or buildings.
<i>Workers Compensation Act & Occupational Health and Safety Regulation</i>	WorkSafeBC	For workers on site, as well as camp planning, e.g., when storing or handling flammable substances. <i>Part 25 Specific to Camps</i>
<i>Fire Services Act</i>	BC Fire Commission	Storing fuel or re-fuelling facilities
<i>Water Sustainability Act</i>	ENV, Regional Water Management Branch, Health Authorities	If water for camp operation is taken from any surface source other than a well, a licence for long term operations or approval for operations up to 12 months is required
<i>Environmental Management Act- Municipal Sewage Regulation</i>	ENV, Environmental Protection Office	If effluent exceeds 22,700 litres/day and is not reused
<i>Environmental Management Act- Spill Reporting Regulation</i>	ENV, Regional Environmental Protection Office, Regional Waste Manager	E.g., if there are spills or soil contamination and waste disposal
<i>Environmental Management Act- Open Burning Smoke Control Regulation</i>	ENV- Environmental Protection Office	E.g., when burning waste (for disposal)
<i>Environmental Management Act- Hazardous Waste Regulation and Legislation Guide</i>	ENV, Regional Environmental Protection Office	Generation, storage and transport of waste
<i>Litter Act</i>	ENV	
<i>Landfill Criteria for Municipal Solid Waste</i>	ENV	
<i>Oil and Gas Waste Regulation</i>	ENV	
<i>Waste Discharge Regulation</i>	ENV	
<i>Forest Act</i>	FLNR/OGC	Removal of Crown timber within the activity area
<i>Forest and Range Practices Act</i>	FLNR	

<i>Environment and Land Use Act</i>	FLNR	
<i>Land Act</i>	FLNR/OGC	Occupation and use of Crown Land. <i>Land Act</i> tenures for work camps are authorized under the following operational policies; i.e. <ul style="list-style-type: none"> • <u>Industrial</u> • <u>General Commercial</u>
<i>Land Titles Act</i>	FLNR	
<i>Mines Act- Health, Safety and Reclamation Code for Mines</i>	EMPR	The Health, Safety and Reclamation Code for Mines in British Columbia outlines requirements for: <ul style="list-style-type: none"> • “lunchrooms and sanitary conveniences,” including lunchrooms, toilet facilities, washing water temperatures, piping, etc. • exploration camps, generally relating to cleanliness and reclamation.
<i>Petroleum and Natural Gas Act</i> <i>Oil and Gas Activities Act</i>	OGC	Issue permits for Oil and Gas activities on Crown Lands. Camps sites are regulated under specific legislation including the Land Act, Forest Act, etc.

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Indigenous Communities and Industrial Camps: Discussion Paper

Version 5 October 2018

Final Draft

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Executive Summary

During the negotiation of Pipeline Benefits Agreements in 2014-15, the Lake Babine and Nak'azdli Whut'en First Nations raised concerns regarding the social impacts of proposed industrial work camps associated with the construction of the Coastal GasLink and Prince Rupert Gas Transmission projects. These two projects contemplated the construction of up to 30 camp facilities during the project lifecycle.

In response to these concerns, the Ministry of Indigenous Relations and Reconciliation (MIRR) and the Ministry of Energy, Mines, and Petroleum Resources (EMPR) provided funding to the Lake Babine Nation and Nak'azdli Whut'en to examine the social impacts of industrial camps and to identify mitigation strategies. *Indigenous Communities and Industrial Camps: Promoting Healthy Communities in Settings of Industrial Change* (The Firelight Report), written with the Firelight Group, was submitted in February 2017 to the First Nations Summit. The Firelight Report highlights the negative social impacts that industrial camps can have on nearby Indigenous communities, and in particular on Indigenous women and children including:

- Increased substance use;
- Increased demand for sex work and higher risks of sexual exploitation;
- Increased economic inequality (high wages of workers vs. low wages of Indigenous women);
- Increased costs of living, and food and housing insecurity; and,
- Decreased ability to connect with Indigenous governance and health/wellness practices such as hunting, fishing, berry picking, etc.

The Firelight Report suggests that industrial camps must be managed and operated in a manner that protects and promotes the health and well-being of the employees at the camps and prevents potential negative social impacts on nearby communities and especially on vulnerable populations.

In March 2017, a broad group of both social and natural resource sector Deputy Ministers struck a cross ministry Working Group (the Working Group) to review the report and develop recommended actions. While the Working Group's mandate focussed initially on impacts associated with liquefied natural gas (LNG) pipelines it was quickly recognized that industrial camps are common across the natural resource sector. As a result, the scope of the project expanded to include the impacts of industrial camps province-wide (i.e., camps associated with forestry, mining, and other oil and gas developments), with a focus on Indigenous women and children in northern British Columbia (B.C.). The Working Group identified five priority theme areas where the province could focus its response:

1. Improving camp operations;
2. Increasing understanding and addressing information gaps;
3. Improving awareness;
4. Legislation, regulatory reform and policy tools; and
5. Supporting Indigenous women and children through community funding and social services.

This Discussion Paper provides a summary of the work to date. Concepts in the paper have been developed with input from representatives of Lake Babine Nation and Nak'azdli Whut'en, and was informed by targeted discussions with a number of Indigenous organizations, the federal government, local governments, service providers and industry. The engagement and research to support this paper focused on impacts to Indigenous women and children, predominantly in northern communities and is intended for internal to government review.

Improving the health and well-being of Indigenous women in contexts of rapid industrial development requires actions from organizations outside of the Provincial government (i.e., RCMP, Federal government, Indigenous governments, Indigenous organizations, etc.). The work that informed this Discussion Paper did not focus on actions by other groups, but acknowledges they are necessary partners for change.

Further engagement with Indigenous people and Indigenous women is needed to scope out possible actions for the Province to consider in better managing industrial camps, to support the development of a Provincial Action Plan. Further development of provincial actions will require endorsement by Provincial Deputy Ministers, significant resources and coordination across ministries and further engagement with Indigenous women, Indigenous governments and organizations, industry, external organizations, service providers and local government.

Acronym List

ALP – Aboriginal Liaison Program

B.C. – British Columbia

EA – Environmental Assessment

EAA – *Environmental Assessment Act*

EAO – B.C. Environmental Assessment Office

EMPR – B.C. Ministry of Energy, Mines and Petroleum Resources

ENV – B.C. Ministry of Environment

EVA BC – Ending Violence Association of BC

FLNR – B.C. Ministry of Forests, Lands and Natural Resource Operations and Rural Development

GBA+ - Gender Based Analysis Plus

IBA – Impact Benefit Agreement

ICR – Industrial Camps Regulation

IGBA - Indigenous Gender Based Analysis

KUG – Kemess Underground Mine

LNG – Liquefied Natural Gas

MACIW - Minister's Advisory Council on Indigenous Women

MIRR – B.C. Ministry of Indigenous Relations and Reconciliation

MOH – B.C. Ministry of Health

MOU - Memorandum of Understanding

NWAC – Native Women's Association of Canada

OGC – B.C. Oil and Gas Commission

OHSR - Occupational Health and Safety Regulation

TKN – Tse Keh Nay

TRC – Truth and Reconciliation Commission

STI – Sexually Transmitted Infection

UNDRIP - United Nations Declaration on the Rights of Indigenous Peoples

A. Introduction

Natural resource development is a major economic driver in B.C. that creates good jobs and supports the economy. There are a number of tools and mechanisms that the Province and industry use to assess, plan for and mitigate environmental impacts from natural resource development. However, the way that social and cultural impacts are planned for and mitigated could be improved. Social and cultural impacts are defined as changes to the way people live, work, recreate and/or organize to meet their needs (e.g. an influx of non-resident workers into communities could: put increased strain on limited recreational centres, or activities, such as hiking and mountain biking trails; lead to a higher cost of living for community members through increased costs of goods, services and housing; alter power dynamics or distribution, community attitudes and identity, and local government governance structures;)ⁱ. Social impacts can be directly attributable to a project or can be caused indirectly by a project's activities. Social impacts can be positive (desirable) or adverse (undesirable). Social impacts can be experienced by an individual, a family/household, a social/cultural group or community.

Natural resource development often requires the establishment of industrial work camps (see text box)ⁱⁱ. Industrial camps are established to support remote work sites, where highly mobile and temporary operations are required and when the workforce cannot be sourced locally. Camps are used to house workforces that support forestry activities, energy and petroleum resource extraction, infrastructure and hydro projects, mining and agriculture. Major projects often require industrial camps as important logistical support for both construction and ongoing operations. Housing workers in industrial campsⁱⁱⁱ can be a way to mitigate some of the social impacts of temporary workers on local communities, for example by preventing increased pressure on local rental markets, by providing in-camp amenities to camp residents, and by creating some physical distance between the camps and the communities.

Industrial Camps: are land or premises on which an employer, in connection with a logging, sawmill, mining, oil or gas operation, a railway construction project, a cannery, or a similar thing, owns, operates or maintains, or has established, permanent or temporary structures for use, with or without charge, by employees as living quarters. This could include accommodation or amenities that are constructed and managed by a third-party supplier where resource companies or “employers” rent out large blocks of rooms at these facilities for their employees who work in the area.

The Province and industry actively seek the support of proximate communities for major projects. The Province engages with affected communities to develop strategies to assess and mitigate impacts and enhance shared benefits, and consults with First Nations on decisions that may impact their constitutionally protected rights. Social impacts of industrial camps are inconsistently addressed in current processes. Generally, there is a limited awareness across the private and public sector of how impacts disproportionately affect Indigenous women and children. As a result, many positive initiatives and benefits that stem from resource development projects do not necessarily address or respond to the concerns of these populations. Municipal governments and Regional Districts have also raised concerns about the negative social impacts of industrial camps and the pressures camps can place on local community infrastructure and services.

When industrial camps are located near Indigenous communities, there is an opportunity for Indigenous communities and the surrounding populations to benefit from the industrial activity in the area. The Firelight Report identified several different types of benefits that communities associate with industrial camps including:

- Nation members returning back home to access new employment opportunities;
- Employment and acquisition of new skills;
- New contract opportunities for service operators and subcontractors;
- Increased revenue for businesses, e.g. community gas station;
- Indigenous representation in management of camps or projects can ensure they are planned and implemented with Nation's needs in mind;
- Collective investment in local infrastructure; and,
- Greater cultural understanding.

However, resource development projects can also have diverse impacts on Indigenous communities. Indigenous communities have raised concerns about the social impacts of industrial camps and the impacts camps have on Indigenous women and children.

Ensuring that natural resource development is supported by proximate Indigenous communities and that social, health, cultural, environmental and economic concerns are addressed is an important component of lasting reconciliation with Indigenous peoples. Efforts are required to both minimize potential impacts from industrial camps and maximize potential benefits to communities.

This discussion paper summarizes research and engagement on the potential impacts of industrial camps, and potential actions that the Province can take that are consistent with government's commitment to reconciliation and the implementation of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and the Truth and Reconciliation Commission's (TRC) Calls to Action. This includes developing mitigation strategies, plans and actions with deep and direct involvement of Indigenous peoples and that reflect the *Draft Principles that Guide the Province of British Columbia's Relationship with Indigenous Peoples*.

This paper summarizes issues related to the social impacts of industrial camps under five emergent themes:

1. Improving camp operations;
2. Increasing understanding and addressing information gaps;
3. Improving awareness;
4. Legislation, regulatory reform and policy tools; and,
5. Supporting Indigenous women and children through community funding and social services.

B. Background/Context

This section provides a background on how the Indigenous Communities and Industrial Camps project was developed, context on impacts of natural resource development on vulnerable populations and describes the project's scope.

B.1 Firelight, Lake Babine Nation and Nak'azdli Whut'en report

In 2016, MIRR and EMPR provided funding to Lake Babine Nation and Nak'azdli Whut'en who conducted research to examine the social impacts of industrial camps located near Indigenous communities and identify mitigation strategies. A final report, *Indigenous Communities and Industrial Camps: Promoting Healthy Communities in Settings of Industrial Change* (The Firelight Report), written with the Firelight Group, was primarily informed by a June 2016 workshop which included participation from: Indigenous community members and representatives; representatives from provincial and regional agencies in both social and natural resource sectors; industry; the Highway of Tears Initiative; and, Amnesty International. The report was also informed by interviews with community members, a literature review and dialogue with the provincial government.

The report was publicly released on February 9, 2017 at a meeting of the First Nations Summit. Specific recommended actions included the need for historic trauma training, a review of legislation, reporting and management practices for sexual assault, consideration of gender and community-based impacts in the environmental assessment (EA) process and increased resources for drug, alcohol and mental health

Community Response:

A number of activities were undertaken, including the hiring of Community Coordinators in Lake Babine Nation. Best Practices related to Community Coordinators included:

- Community activities should have leadership support;
- The work needs to start early, as it takes time to build relationships and develop long term trust and rapport in the community;
- Training to help Community Coordinators connect community members to information and resources, and how to provide trauma support to community members is needed; and,
- Other community training, such as violence prevention, elder abuse, anti-bullying and health forums, would also be valuable to both community members and service providers.

Creative initiatives were also undertaken by Nak'azdli Whut'en, who developed harm mitigation strategies for workers at the end of mine shifts. Best practices included:

- Providing supports to families while someone is away at camp;
- Providing supports, including greeters at the mine shuttle stops, for workers returning back to communities from camps; and,
- Taking a harm reduction approach to drug and alcohol use and addiction, violence and abuse.

counseling. Provincial Deputy Ministers created a cross ministry working group (the Working Group) to review the recommendations made in the Firelight Report and to advise and provide feedback on potential government actions.

Lake Babine Nation also received a provincial grant to support the development of a Lake Babine Nation and Nak'azdli Whut'en joint community response to the 2017 Report (see text box on previous page). This funding also supported the Lake Babine Nation and Nak'azdli Whut'en's participation on the Working Group.

B.2 Impacts of natural resource development on vulnerable groups

There is a growing body of evidence that suggests resource-based extractive industries can result in adverse social, economic, and cultural impacts, including impacts on the social determinants of health. These changes can in turn lead to cumulative impacts on the health and well-being of individuals and communities^{iv}. These impacts are complex and shape individual and community experience in diverse ways.

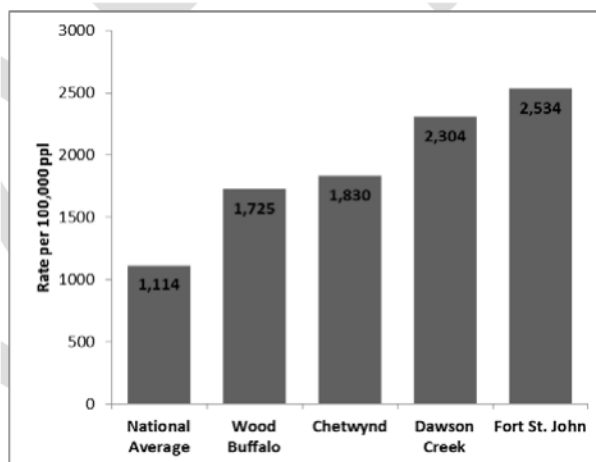
The benefits and costs of resource extraction are not equitably distributed among different segments of the population and disproportionately affect vulnerable groups including Indigenous women^v. Historic

Figure 1: 2015 Police reported Instances of Violence against Women

Note, police reported instances of violence against women are likely to under represent true rates of violence in communities

Source: Statistics Canada- Retrieved from Discourse Media

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and contemporary contexts, including years of colonial policies and practices has created a legacy of social problems that contribute to the challenges faced by vulnerable populations in Indigenous communities. Figure 1 illustrates how women face higher rates of violence in resource extraction communities than the national average^{vi}.

The legacy of residential schools and the imposition of colonial and patriarchal modes of governance and family-making (i.e., how family systems are defined) have led to the suppression of Indigenous culture and Indigenous modes of governance^{vii}. The emotional, physical and sexual abuses that both boys and girls experienced in residential schools have led to trauma being passed on from generation to generation. As a result of this history, Indigenous men, women and children continue to experience systematic discrimination, prejudices and are disproportionately being affected by violence, poverty, and illness^{viii}.

While all portions of Indigenous communities continue to struggle from the effects of colonization, women within Indigenous communities continue to experience disproportionately high levels of violence. For example, while Indigenous women make up only 5 per cent of the female population in Canada, they accounted for 24 per cent of all victims of homicide in 2015^{ix}. Furthermore, Indigenous women are three times more likely to be victims of violence than non-Indigenous women, and those violent situations are eight times more likely to end in homicide^x.

Amnesty International (*Out of Sight, Out of Mind*) and the Firelight Group with Lake Babine Nation and Nak'azdli Whut'en (*Indigenous Communities and Industrial Camps*) have applied a gendered lens to demonstrate the ways resource development can negatively affect Indigenous women and children. These include:

- Increased sexualized violence, domestic violence, sexual harassment, rape, and assault;
- Increased problematic substance use;
- Increased demand for sex work and higher risks of sexual exploitation;
- Increased economic inequality (high wages of workers vs. low wages of Indigenous women);
- Increased costs of living, and food and housing insecurity; and,
- Decreased ability to connect with Indigenous governance and health/wellness practices such as hunting, fishing, berry picking, etc.

These reports conclude that the use of mobile workforces that are disconnected from the region can reinforce and recreate historical patterns of violence against Indigenous women. Industrial camps must be managed and operated in a manner that protects and promotes the health of the employees at the camps and prevents potential negative impacts on nearby communities – especially vulnerable populations.

B.3 Project Scope and Working Group

The Working Group is led by co-chairs from EMPR and MIRR, with the support of two staff (the Project Team). Membership of the Working Group includes representatives from provincial government ministries, a regional health authority, the Minister's Advisory Council on Indigenous Women (MACIW) and Indigenous representatives from the Lake Babine Nation and Nak'azdli Whut'en (see [Appendix 1](#) for membership).

The Working Group was asked to review the Firelight Report recommendations and identify potential government actions. The Working Group had the following objectives:

- Review the Firelight Report recommendations and identify potential government actions;
- Work closely with Indigenous partners to ensure the process, issues and proposed solutions reflect Indigenous perspectives;
- Conduct a gap analysis to determine linkages to existing programs (provincial, federal, and industry) and identify possible gaps and areas for action;

- Provide input to inform the development of a Provincial Action Plan; and
- Identify appropriate stakeholders and industry groups (oil and gas, mining, forestry and local government) to engage and to explore roles and responsibilities.

The Project Team, with support of the Working Group, had targeted scoping conversations from June 2017 to January 2018 with stakeholders and organizations with experience and interest in the issue. An iterative approach was taken, with Working Group members suggesting initial stakeholders and organizations and those individuals suggesting subsequent contacts.

Targeted scoping conversations sought to apply an inclusive Indigenous and gendered lens with focused representation from diverse Indigenous communities and organizations (i.e. Indigenous governments, Métis, on-reserve, off-reserve) and women's organizations. This initial engagement helped to: improve the Province's understanding of existing work and the issue, identify the scope of potential actions and solutions and possible opportunities to collaborate and leverage existing programs. This approach helped to identify priority groups that should be engaged with over the long term for the development of initiatives, programs and potential legislative and regulatory changes.

The Working Group's original mandate focused on understanding concerns and proposing solutions related to the construction and operation of LNG pipelines. However, a broad range of issues emerged around the impacts of all industrial camps. The range of issues is broader than any single industrial sector, takes into consideration the complex historic and contemporary factors that contribute to the vulnerable status of Indigenous women and children and requires an acknowledgment of the complexity of the interrelated factors and drivers. As a result, the scope of the project has expanded to include the impacts of all industrial camps province-wide (i.e., camps associated with forestry, infrastructure and power projects, mining, and other oil and gas developments). The Project Team took an inclusive approach aligned with the principles in UNDRIP and considered impacts and solutions applicable to all Indigenous peoples with a focus to Indigenous women and children living in northern B.C.

While the mandated scope of this project has focused and continues to be primarily on Indigenous women and children, it is recognized that natural resource development can also disproportionately and adversely impact elders, Indigenous men, gender-diverse and two-spirited people and other vulnerable groups. Engagement has also highlighted that initiatives aimed to improve the well-being and safety of Indigenous women and children require men to be part of the solution and should take a holistic and inclusive approach to community development.

Many of the learnings and leading practices identified through research and engagement have the potential to support other vulnerable populations, the well-being of camp residents and Indigenous and non-Indigenous communities impacted by industrial camps as a whole. Given the complex interplays between Indigenous and non-Indigenous communities, on and off reserve populations, social service delivery and social issues in general, the benefits that would be achieved by the recommendations provided in this Discussion Paper have the potential to improve broader overall social and health outcomes.

Many of the issues raised related to improving planning, communication and relationship building are also applicable to non-Indigenous communities. As the focus of this Discussion Paper is Indigenous women and children, and more broadly Indigenous communities, further work is required to determine if recommendations should be broadened to include other non-Indigenous communities.

C. Discussion: What We Heard

This section of the Discussion Paper provides a summary of what was heard from the Working Group, what was heard from targeted scoping conversations and from what was found in relevant research.

Based on this work, the Working Group identified five emergent themes of action:

1. Improving camp operations;
2. Increasing understanding and addressing information gaps;
3. Improving awareness;
4. Legislation, regulatory reform and policy tools; and,
5. Supporting Indigenous women and children through community funding and social services.

C.1 Improving camp operations

Impacts that an industrial camp can have on local communities and Indigenous women and children are influenced by:

- Location;
- Camp culture;
- Communication and community relationships;
- Camp amenities and services;
- Workforce demographics; and,
- Camp policies.

These factors influence worker behaviours off-site and outside of work hours (e.g., when workers are transiting through communities or visiting regional hubs on days off. Worker behaviour outside of the workplace is generally not regulated (see section C4. Legislation, regulatory reform and policy tools), and is complicated to manage and mitigate, but was an issue that was raised throughout the research and engagement process.

C.1.1 Location

Siting of industrial camps has important social implications for camp residents, workers' families and for proximate communities. Siting decisions are typically based on the physical and geographic features of the area, access to infrastructure and maximizing economic benefits from the influx of workers in communities. For projects that qualify for an EA assessment, First Nations have the opportunity to notify

agencies (i.e., the B.C. Oil and Gas Commission (OGC) in the case of oil and gas development) of any concerns regarding camp location. However, in many cases concerns about the social impacts from locating camps near Indigenous communities are not raised or there is no opportunity for them to be raised in the case of smaller projects that do not qualify for EA assessments.

Being located in remote areas can also influence camp culture. Remote, isolated camps that lack positive social outlets can have negative impacts on the mental health and well-being of camp residents. As a result, as a means to relieve the stress associated with camp life, camp residents returning home or transiting through local communities may respond and behave in ways that negatively impact communities.

A report by the University of Northern British Columbia (2015) suggests increasing camp resident access to local communities can foster improved connections and communications, reduce stigma, enable more positive family dynamics for the camp workforce and enhance economic development opportunities for the community^{xi}. However, not all Working Group members, stakeholders, external organizations and Indigenous representatives and organizations were supportive of increased access. Because there is limited corporate responsibility or regulatory oversight of workers off site, some individuals expressed that access to proximate communities by camp residents should be limited as a strategy to mitigate risk. This illustrates that the siting of work camps is very much situation and community dependent, underlying the importance of engaging early with nearby communities to understand local perspectives, concerns and opportunities before a siting decision is made. Indigenous communities have varying perspectives, and there may be an opportunity to promote peer-to-peer learning between communities already impacted by resource development and those being consulted on proximate future projects.

Industrial camps can have other, indirect impacts on Indigenous communities. For instance, camps can increase camp residents' access to the backcountry resulting in increased hunting and other activities. This activity can have a negative impact on traditional harvesting areas, cultural and other sacred sites. Since Indigenous communities' spiritual, cultural, and social practices are tied to the land base, the presence of an industrial camp can disrupt their ways of life and can have negative impacts on overall health and well-being. In addition, the presence of workers can increase demand, and the cost, for basic necessities in remote communities. Siting decisions, camp locations and policies dictating camp residents' access to proximate communities can help to mitigate some of these impacts.

Factors that industry, with the support of governments and local communities, could use to help address impacts associated with camp siting and location include:

- Including social impact assessments in the planning process for camp siting, design and operations;
- Involving Indigenous governments, non-Indigenous communities and service providers in preliminary discussions and decisions of camp location;^{xii} and,
- Implementing a flexible approach to addressing community concerns throughout the lifecycle of the camp (planning, operations, and post-operations).

C.1.2 Camp culture

Industrial work camps often house male-dominated workforces. The culture of industrial work camps has been described as a hyper-masculine work environment, where sexist, racist and homophobic views are expressed. Although these views may be prevalent elsewhere in society, the nature of camp work, including long stressful hours and time away from families, communities and social norms can create a culture that lacks self-care and collective accountability. This can affect worker behaviour in and outside of camp, and create a culture where sexist, racist and homophobic views go unchallenged. This environment can often feel unsafe or undesirable for women and Indigenous people.

Long work hours, long stretches of work days without days off and the lack of importance put on self-care, also mean camp residents often seek opportunities to release stress at the end of their work rotation. This culture of “blowing-off steam” can lead to significant increases in alcohol and drug consumption and demands for sex work, which are often sought from the surrounding communities or regional centres and transit hubs. In addition, camp culture and operations often lack a focus on well-being; workers with existing or emergent mental health issues may be underserved at the camp and present a pressure on medical services in nearby communities.

Camp culture can result in a number of negative social impacts. These include:

- Increased demands for sex work, which disproportionately affects Indigenous women;
- Risky and inappropriate behaviour;
- Increased substance use (in particular during off-work hours) which leads to increased availability and demand for illicit substances in rural areas; and,
- Decreased volunteerism and social cohesion in host communities where local residents are required to live in camps while working on projects.

The factors contributing to the culture of work camps are not limited to inside the camp itself. Indigenous female respondents to a study conducted by Status of Women Canada identified specific periods of increased violence and abuse against Indigenous women and girls, citing “work holidays or breaks” when transient workers traveled into neighboring towns to “blow off steam and binge drink” and “pay days” when transient workers had cash to spend on alcohol and sex workers^{xiii}. Conversations with the RCMP highlighted increases in crime rates when temporary workers are on break.

Locating camps near Indigenous communities provides an opportunity for cultural learning and reconciliation to occur but must be supported through cultural safety and historical trauma training and proactively developing trusting relationships. This could involve:

- Indigenous communities developing Cultural Competency Handbooks that outline advice and expectations for industries operating near communities;
- Cultural orientation for camp operators to build cultural competencies, including tolerance and respect;

- Training camp managers and employees on historic trauma, colonization and cultural safety (i.e., cultural training to better understand values of Indigenous workers and the ways that camp culture, worker accommodation and shift arrangements might impact these values);
- Providing orientation, education and supports for camp residents in industrial camps which could include:
 - Reporting or speaking up against poor behaviour in camps;
 - Identifying and responding to signs of domestic violence;
 - Addressing and preventing substance use, addictive disease and associated harms;
 - Creating opportunities for intervention and prevention to break cycles of violent behaviour;
 - Identifying and responding to signs of sex trafficking;
 - Identifying and addressing sexual harassment and assault; and,
 - Creating cultural opportunities to build relationships with communities.

C.1.3 Communication and community relationships

The level of communication between proximate communities and industrial camps varies. Municipal governments and Indigenous representatives have both indicated that they are not always informed of the presence of proposed or existing industrial camps. Some camps have limited communication with proximate communities, may not have agreed upon communication protocols, camp policies, and are not required to set up mechanisms to address grievances. Furthermore, when communication and continuous improvement processes (sometimes called grievance processes) are in place through proponents, they may not apply to contractors and other businesses that provide services to the industrial camp or the project.

Initiatives that may help foster good communication between work camps and local communities include:

- Establishing agreed upon communication protocols. Communication protocols between the camp operators and communities should be set out during work camp planning;
- An industry-established process for communities and individuals to bring concerns forward to the operators, sub-contractors and owner of the major project for investigation and follow-up. This should include a grievance and/or continuous improvement process for communities to notify operators of any concerns or incidents. A continuous improvement process could include community advisory panels that provide a forum for community members to identify economic and social issues to operators and that would result in continuous improvement to policies, services or operations;
- Creating and funding social liaison programs in communities to monitor and report issues related to camps to Indigenous government offices (e.g., develop socially focused Aboriginal Liaison Program) and appropriate government agencies; and,
- Funding holistic wellness and safety plans for communities (and potentially for the camps themselves).

Although not the focus of discussions for this project, Working Group members noted that projects can have positive impacts on local communities including: enhanced economic benefits; employment opportunities; and, access to and use of improved infrastructure, services and amenities. Projects often have stringent compliance and enforcement of environmental and safety standards which can contribute to more positive relationships with communities (See best practice text boxes below).

Best Practices: Tahltan Socio-Cultural Working Group

Indigenous communities are seeking to strengthen their capacity to share in British Columbia's economic prosperity. The Tahltan Socio-Cultural Working Group was set up to manage the socio-cultural impacts of the Northwest Transmission Line on Tahltan people.

The Socio-Cultural Working Group (SCWG) approach sets the conditions for innovative systemic change to strengthen First Nation/Indigenous Community strategic and institutional capacity to promote community wellbeing and incrementally improve socio-cultural and economic outcomes for the First Nation/Indigenous Community, its families and citizens. This adaptive framework allows for development and evaluation of work plans on a rolling basis and has expanded to include social and cultural impacts of the Red Chris and Brucejack Mine Projects.

The Tahltan SCWG is developing cultural competency handbooks that will be a guide for employers in the territory. The handbook shows how employers can enhance the opportunities for Tahltan members, so they feel valued at workplaces and will help employers promote and respect the people on whose lands they earn their income.

Best Practices: Collaboration Tables for Major Projects – Kemess Underground Mine

Some First Nations have expressed concerns about the EA process, citing their limited capacity to engage in a technical and time intensive review, the focus on western science, and the lack of decision making authority for First Nations. By changing how the Province works with First Nations on EA reviews, risks of legal challenges are reduced, a more positive investment climate is created, and the Province's goal for reconciliation with Indigenous peoples is supported. One example of this is the collaborative approach that the Province took with Tse Keh Nay (TKN) in the EA process for the Kemess Underground Mine (KUG).

A significant shift in the BC Environmental Assessment Office's (EAO) process was defining the government to government relationship with TKN and reaching agreement on the shared responsibilities of the EAO and TKN, as set out in the Collaboration Plan. Through this Plan, the EAO established co-administration of the EA process and a path for seeking consensus on decisions in the EA. A unique approach to the EAO's assessment was taken, whereby TKN drafted key elements of the EA decision materials related to impacts of KUG on TKN's Aboriginal Interests, a role normally undertaken by the EAO. This ensured that TKN had a voice in the EAO's assessment. During the EA process, TKN raised concerns that were not project-specific and could not be addressed through the EA or subsequent permitting, but were vital to the TKN being able to support further development within their traditional territories.

The Province was responsive to those non-EA interests and created a venue for broader issues (a government to government table), aligning their timeframes with the EA in a way that allowed TKN to have confidence in those issues being addressed. Notably, during the EA process, EMPR and EAO were willing to discuss how issues of concern would be addressed in their subsequent permitting process and began development of a permitting collaboration plan with TKN, modelled on the EAO's collaboration plan. The existing collaborative relationship between TKN and AuRico was key to the success of this approach, providing a good foundation for the EAO and TKN to implement new and creative approaches within this EA.

This new approach resulted in a timely and durable regulatory decision, built trust and confidence for investors and industry, advanced the credibility of the regulatory regime, fostered a more seamless permitting process and demonstrated how B.C. is implementing reconciliation with Indigenous peoples.

C.1.4 Camp amenities and services

The amenities provided at camps are generally driven by a need to attract and retain qualified workers and keep workers in camp. Amenities can include the services that are available to camp residents on-site (i.e., health and medical services) as well as social and entertainment services provided by the operator. All of these amenities can shape worker behaviour off-site and outside of work hours. Non-health and medical amenities that could help limit social, service and infrastructure impacts on neighbouring communities include:

- Regulated wet lounges. Lounges can limit drinking in towns and reduce binge behaviours;
- Wi-Fi and communications technology. The ability to communicate can enable camp residents to remain connected with their home community;
- Recreation facilities. Recreation facilities provide positive social outlets and can function as shared infrastructure and resources for proximate communities.

In addition to camp amenities, services and programs offered on-site can help camp residents to build resistance to work related stress, mitigate effects associated with the camp environment and support mental health and well-being. Camp operators are required to meet WorkSafeBC legislation through on-site health and safety programs. However, these programs do not address risky behaviours outside of the workplace or necessarily translate into amenities to improve overall well-being (see section [C4](#)).

If a project triggers an EA and is awarded an EA certificate, the Environmental Assessment Office (EAO) can require certificate holders to provide certain services and amenities. The EAO often works with health authorities (i.e., Northern Health) to determine the appropriate level of services. In this context, there is an opportunity for community representatives, EA Working Group members, industry or regulators to identify camp amenities that would serve to mitigate potential project impacts. An example of this would be major projects with large camps in the Northern Health region which contain conditions for the inclusion of health service mitigation strategies, such as on-site clinics. For projects outside of the EA process, industry and operators determine the level of services and amenities they are willing to provide at industrial camps (see section [C4](#)).

Camp, services and programs that foster wellness and social connectedness and prevent problematic substance use and associated harms (such as on-site sexual health counselling and education, sexually transmitted infection (STI) testing and/or linkages to these services) can prevent and mitigate impacts to workers, their families and proximate communities and include:

- Employee and Family Assistance Programs. While many companies have access to Employee and Family Assistance Programs, awareness of the programs could be increased as a tool to support workers;
- On-site medical facilities. Camp residents may experience disruption in their access to health services when living in camps and may need to access health services in proximate communities. On-site medical facilities provide continued access to health services for camp residents without impacting proximate community services. On-site health care can also help minimize other

impacts to communities (e.g. by offering sexual health supports, assistance for workers experiencing mental health issues and/or substance use disorders, etc.); and,

- Social programming and activities. These on-site programs should be provided as a positive means of stress relief and to mitigate the psychosocial effects of the camp environment (i.e. a well-equipped gym, sports, bowling, trivia nights, game nights, or hobbies).

C.1.5 Workforce demographics

Industrial camps are often male-dominated. As outlined in section C.1.2, the transient nature of work camps can create a culture of limited individual and collective accountability. There are fewer self-regulating social norms dictating camp behaviours and a culture that can reinforce a lack of self-care. Evidence suggests that the presence of women improves the culture of male-dominated industries. A promising tactic is to create strategies to accommodate and retain women in male-dominated industries. However, work practices and policies make recruitment of women difficult. Limited retention and recruitment strategies for women (duration of shifts, access to childcare, resources and safety supports etc.) contribute to male-dominated camp settings. Supports need to be in place to make industrial camps safe and inviting environments for women.

Improving employment conditions to make industrial work more attractive to female workers could help to address this issue. This could include:

- Introducing shorter shifts to accommodate childcare needs;
- Specific training programs for women;
- Developing strategies to assist male workers to address cultural changes and being more inclusive of women;
- Providing day care services;
- Providing suitable and safe accommodation and bathrooms for women;
- Providing site security; and,
- Equitable hiring practices and anti-harassment policies.

C.1.6 Camp policies

Camps generally have policies that dictate expected behaviour for workers. These policies are developed to address the health, safety and efficient operation of the project for which workers are employed. However, policies do not necessarily consider or reflect the concerns of proximate communities and vulnerable populations.

Companies can demonstrate their expectations about camp culture by setting out expectations through worker codes of conduct that would apply on and off worksites and camps and inside and outside of work hours. A worker code of conduct that applies outside of work hours and outside of work and camp locations could be a mechanism to ensure behaviour in the community is aligned with employer expectations. A worker code of conduct could include social contracts as a condition to residency where

breaches can result in dismissal from employment, or mandatory training and rehabilitation programs. These contracts could set out standards for behaviour and consequences for action set out by a community advisory group. For government contracted camps, a worker code of conduct could be required as part of contract procurement. This requirement could have long term positive effects, for example, in temporary emergency camps, but typically the same contractor is procured every year.

Social Codes of Conduct: The Town of Labrador City has insisted that all workers in camp accommodation sign social contracts as a condition to residency where breaches can result in dismissal from employment. These contracts set out standards for behaviour and consequences for action set out by a community advisory group and are seen to have made a positive difference in worker's behavior (House of Representatives, 2013).

Camp policies have the potential for having large impacts to camp worker behaviour. For instance, providing camp workers a snack on their way home from camp has been shown to reduce incidence of domestic violence over time. Working with researchers, like the B.C. Public Service Agency's Behavioural Insights Group, camp contractors and communities, could help to identify and test changes to camp policies to limit impacts on proximate communities. These tested operational changes could inform the development of best practices.

Other policies could be developed and/or amended to outline clear expectations for camp residents on issues such as:

- Access to vehicles and transit between proximate towns and the industrial camp;
- Alcohol and other drug use;
- Housing requirements (e.g., camp guests, tenancy requirements);^{xiv} and,
- Firearm use and hunting.

Policies that limit worker access to communities are strategies that have been used to mitigate risk when there is little corporate oversight on worker behaviour off-hours and off-site. However, completely cutting off a camp from the community can limit economic benefits for local businesses, increase the social isolation of workers and limit workers' access to social supports. Segregation also does not address institutional racism and does not contribute to improving cultural awareness.

Initiatives that may help address the social impacts of worker behaviours on Indigenous communities include:

- Creating mechanisms for communities to provide input and influence camp policies;
- Engaging early with communities on the design of camp policies; and,
- Creating mechanisms to revise camp policies in response to emerging concerns from the community.

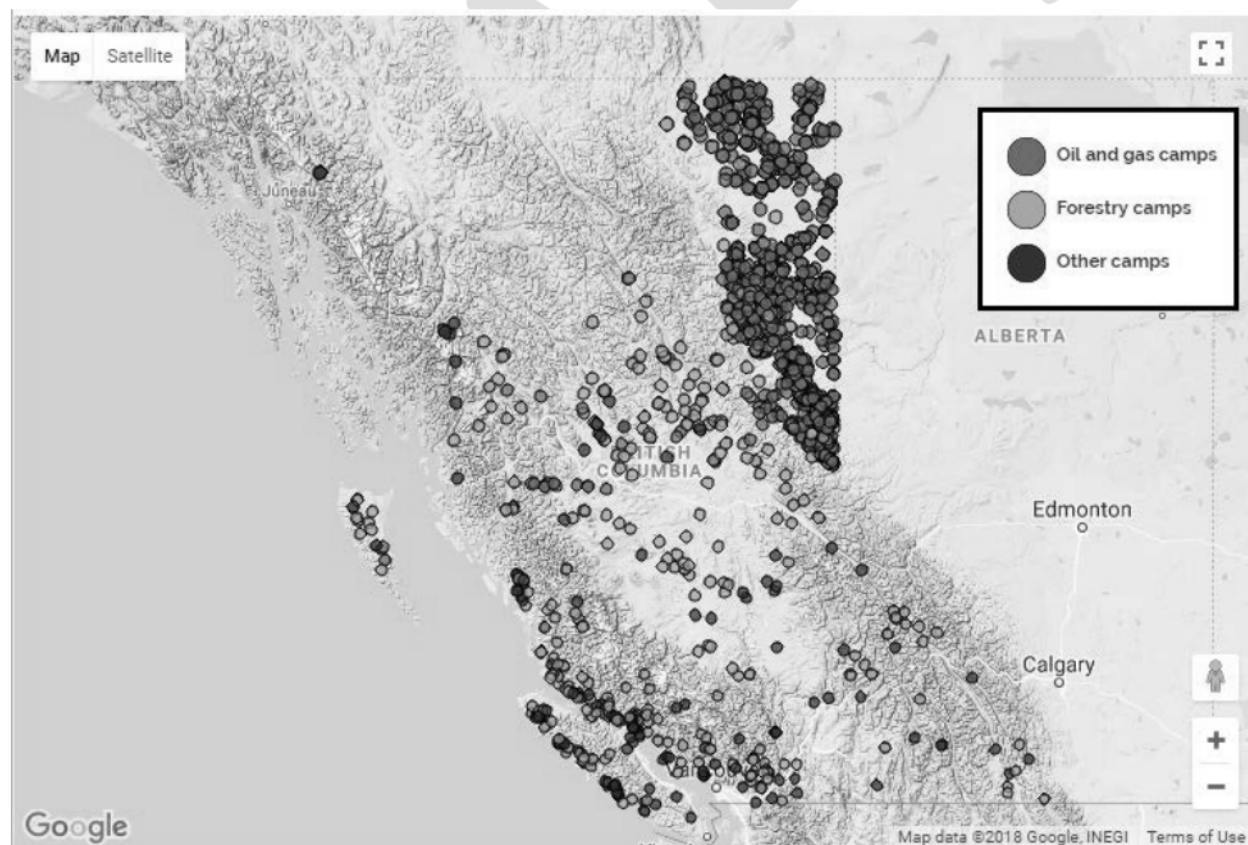
C.2 Increasing understanding and addressing information gaps

C.2.1 Number and location of industrial camps

There is no single agency responsible for tracking and documenting industrial camps in B.C. The OGC, for example, has data on camp applications and permits within their regulatory authority, but their data is not linked to data collected by other agencies. Data is inconsistently collected across sectors, not centralized and can be challenging to track down. As a result, the Working Group was unable to obtain accurate and timely estimates of the total number of camps in operation, locations, number of occupants, whether they are active or their duration of use. A number of organizations have tried to estimate the number of industrial camps in B.C. with estimates varying widely. In 2012, Northern Health estimated there were 1800 camps related to forestry, mining, oil and gas and hydroelectric activities in the Northern Health region.^{xv}

Building off this methodology, Discourse Media (2018) estimated that there were 2000 camps in all of B.C., although they were unable to determine which of these were active (Figure 2)^{xvi}. Recent

Figure 2: Map of industrial camps in B.C. (Fionda, F. & Jones, E.)



information on sewage and waste disposal permits from Northern Health shows there are only 105 active and 6 pending camps with permits in the north, serving up to 9,585 workers, representing about 3% of the permanent population in the same area. This does not include permits for larger industrial camps that would require a permit under the *Environmental Management Act*. This figure is inconsistent

with the estimated 293 camps that have been issued water permits.^{xvii} The lack of consistent data on industrial camps underscores the challenges in identifying the scale of activity and developing appropriate mitigation measures.

Workers can also be housed in hotels, lodges, motels, or other temporary accommodations that are not classified as traditional “industrial camps”^{xviii}. This transient, shadow population is even more difficult to estimate and may have the same or larger impacts on communities due to a lack of industry and corporate oversight and policies to dictate behaviour. These workers are likely to use the amenities and services located in proximate communities and may be driving many of the concerns raised during engagement with service providers.

Developing appropriate actions to assess, plan for and mitigate the potential social impacts of camps and transient workforces requires accurate information, notification and monitoring. It was suggested that government needs to develop a centralized database and notification system to collect, track and share information related to camps and non-resident workforces. In particular, there is limited ability to share and coordinate information on natural resource decisions with the social sector for non-EA reviewable projects. Without additional information (e.g., on the total number of non-resident workers) there is limited ability to understand the cumulative impacts on social indicators, to consider indirect impacts or to conduct regional land use and community planning that responds to the realities of having large proximate camp populations. However, any efforts to coordinate data collection across sectors and notification of camps across the province will require a deeper examination of the ways that camps are currently regulated and permitted.

C.2.2 Social impact monitoring and baseline data

The social impacts of resource development are complex and result in different experiences for different individuals and communities. Standard research approaches may not capture and reflect the range of communities’ experiences. Other approaches may be more appropriate, such as community-based participatory research which is not widely used in policies and decisions related to natural resource projects. Quantitative data has considerable limitations when considering local experiences, yet is often considered superior to qualitative data. Small population numbers make tracking social indicators challenging, particularly with regard to sensitive or confidential health or income information. Social indicators are generally collected and developed externally, without recognizing the right of Indigenous governments to define community wellness, identify relevant indicators and collect, own and manage data.

Access to timely information on social, economic, cultural, natural resource and environmental data is a key component of planning, governance and developing and tracking responses to concerns. The lack of camp data and data on the attributes that contribute to or mitigate their social impacts makes it difficult to determine the impact and identify best practices^{xix}. For example, not having data on how access to services affects worker behaviour makes it difficult to know what services are needed.

The EA process only considers significant adverse impacts on reviewable projects. This leaves limited mechanisms to address the social impacts of camps outside of the EA process, the cumulative impacts of multiple camps, indirect impacts of camp populations or more general impacts of transient workers and boom-bust cycles of resource development (including consideration of broader historical and socio-cultural contexts and vulnerabilities).

While the EAO is currently working to improve the way that social impacts are considered in the EA process, there is a general lack of baseline data on social indicators in communities across the Province. Although a set of social determinants of health have been developed by the Office of the Provincial Health Officer, it has been proposed that greater understanding and evaluation of the social impacts of camps should be developed to ensure that impacts experienced from camps can inform other areas of social policy and programming^{xx}. Social indicators could be developed that reflect community values and could be used to estimate potential social and health outcomes from proposed camps, as well as to inform broader social policy and resourcing decisions. Baseline information and evaluations of a diverse cross section of camps in partnership with communities would be required as without this information, it is not possible to distinguish to what extent social impacts are driven by industrial camps, transient workers or other factors.

Further engagement with Indigenous women, Indigenous leaders, industry associations, industry, contractors, service operators and camp workers is important to deepening understanding of the impacts of industrial camps. While engaging with all these groups is recommended, in particular the Working Group heard suggestions to:

- Engage with Indigenous women. Engagement with the population most impacted is vital to better understanding the impacts of industrial camps. The MACIW could offer advice on how to facilitate focus groups, one-on-one sessions, or other culturally appropriate engagement strategies that are flexible to the needs of individual communities;
- Engage with Indigenous leaders. Engagement with Indigenous leaders is vital to gaining a better understanding of the full range of both positive and negative impacts from industrial camps. This should include a discussion about addressing the social impacts of industrial camps in benefit negotiations; and,
- Hold focus groups with camp workers, their families and camp operators. Industry has a positive perception about changes in camp culture and camp impacts that is at odds with what the Working Group found through discussions with social service providers and other research. Engaging directly with camp workers and operators would inform the understanding of camp culture itself and contribute to actions that will be more successful. Information from focus groups could be used to engage further with unions, worker and industry associations.

C.2.3 Information sharing

There is limited capacity to share information on social data and coordinate responses across provincial ministries and agencies. Information on social indicators is not centralized and is not linked to information on natural resource decisions or extraction or shared with natural resource ministries.

Limited information sharing between these sectors makes proactive planning (including in community and economic development and land use) and responses challenging. There is also limited information sharing on mitigation strategies for social impacts with communities or decision makers in the project proposal phase of the EA process.

The lack of information sharing can create inefficiencies in permitting and compliance and enforcement for camps in some sectors. The B.C. Chamber of Commerce (2014) identified up to 11 different onsite inspections required after a camp is permitted.^{xxi} This can lead to limited coordinated oversight in inspections, a challenge articulating in particular for inspections related to health and safety where capacity to travel to remote locations is limited. Information is not necessarily shared between these various agencies. There is an opportunity to improve information sharing between ministries and other authorities (i.e., WorkSafeBC and Northern Health) by reporting any permitting authorizations and other information about existing or proposed camps.

At the same time, there is a perception that Indigenous communities, service providers, planners and other orders of government are not informed of planned or operating camps in their areas of jurisdiction, in particular for regions with many small operating camps. This limits the ability to proactively plan for the presence of industrial camps and transient worker populations associated with many projects across different sectors.

A regional social impacts risk register could be developed to link camp data (when collected) to existing assets in the region. The potential impacts of heavy industrial activity, multiple industrial activities or several camps in one area could be assessed in relation to existing assets, infrastructure and services. Using this method, “red zones,” where there are high potential impacts from industry, could be identified and could inform community and regional planning.

C.3 Improving awareness

Decision makers, service providers, public servants, industry workers, industry executives and social impact assessors may not understand: the historic and cultural factors that have shaped Indigenous communities (including the ways that social issues have emerged from colonial policies and practices); Indigenous worldviews; or a community’s vision for the future.

The TRC Call to Action 57 calls upon all orders of government to provide education and training to public servants on “the history and legacy of residential schools, UNDRIP, Treaties and Aboriginal rights, Indigenous law, and Aboriginal-Crown relations.” The Call to Action highlights the need for “skills-based training in intercultural competency, conflict resolution, human rights, and anti-racism”^{xxii}. These approaches are equally relevant and necessary for industry executives, management and workers, and are echoed in Call to Action 92 aimed at the corporate sector.

The contemporary and historic realities of Indigenous peoples have resulted in individuals and communities experiencing cumulative trauma from daily stressors of violence, concentrated poverty and historic and structural racism and disenfranchisement.^{xxiii} Frameworks and policies that include a cultural

component and trauma-informed approach grounded in an understanding of Indigenous worldviews and experiences can improve and support community well-being. Trauma-informed approaches are needed for service delivery, training and Indigenous supports and should apply to policy design, community building and engagement processes. Indigenous Gender Based Analysis (see textbox on next page) is one approach that could integrate these considerations into public or private sector decision making processes.

Generally, raising awareness and sharing information has been highlighted as an important tool to ensure existing initiatives better support the needs of Indigenous women and children. It is important that Western and patriarchal governance models do not further or continue to marginalize Indigenous women. Currently, there are visible and invisible barriers to Indigenous women participating in and expressing concerns related to resource development on their territories.

C.3.1 Public Sector

The social impacts of industrial camps experienced by Indigenous communities are affected by broader government policies and decision-making. The Government of B.C. must consult with Indigenous peoples on decisions and actions that could potentially affect their rights. As part of this process, the Province seeks to engage with Indigenous communities and ensure that they share the benefits of projects. Government-First Nation benefits agreements tend to focus on accommodating impacts to rights and title through revenue sharing, land provision, economic development and employment opportunities. Some benefits agreements allocate a portion of funding to address social issues at a high level such as housing, health care, and child and family services. However, agreements generally do not focus on broader social determinants of health, community well-being and anti-violence measures, or on impacts and benefits of projects on Indigenous women and children. These agreements take years to negotiate and implement and may not address preventative issues related to short term camps. Agreements do not consistently identify social issues so there is not a consistent stream of funding for social issues arising from resource development impacts.

There is room to improve the way gendered, health and social impacts (increased risks of violence, sexual exploitation and demands for sex work, increased prevalence of STIs and communicable diseases, or differential wage, employment and affordability impacts) are addressed in EA processes, s.13

IGBA and an Indigenous lens to GBA+ has emerged s.13 to assess and mitigate social and environmental costs of projects and increase the benefits of development for vulnerable groups. s.13

s.13 The concept of IGBA aims to help better acknowledge and understand the historic and contemporary discrimination experienced by Indigenous women and gender-diverse people and engage them in processes that affect their life opportunities.

s.13 s.13 reaching to all budgeting, policy, and programming processes across government for the implementation of GBA+. s.13

s.13

Gender Based Analysis is an analytical tool that uses gender (social identity) as an organizing category and addresses the differences between women and men in a social context.

GBA+ acknowledges that GBA goes beyond sex and gender differences and considers how other factors like race and class, intersect and influence peoples' experiences in complex ways.

Indigenous Gender Based Analysis (IGBA) is an emerging approach. It begins from the position that colonization has – through a number of approaches and processes, including the forced implementation of patriarchal, Western versions of governance and family-making – contributed to the historic and contemporary marginalization of Indigenous women and gender-diverse people by creating patterns of violence and devaluation that continue today.

s.13

C.3.2 Corporate Sector

The Working Group heard a wide range of input from industry, contractors, service providers and communities. Contrasting narratives emerged about how camps are run and their impact on communities. It was noted that rising commodity prices prior to 2014 created increased competition for skilled labour and that, as a result, a number of initiatives were undertaken to improve the living conditions of workers, with a focus on safety and performance. Consequently, industry contends that camps are addressing the hyper-masculine culture and have become healthier places to work.

However, service providers confirm that many of the same social issues are still present (higher demand for sex work, human trafficking between camps, racism towards Indigenous workers, and increased instances of women and children fleeing violence). There is a need for more detailed and industry specific information about these issues, appropriate processes and mechanisms for response, and effective mitigation strategies.

Many companies, in particular for large projects, actively seek to minimize and mitigate negative impacts and to create, maximize and enhance the socio-economic benefits of project development as a means to gain social license and positive support for projects^{xxv}. Some companies go beyond the Crown's consultation requirements and pursue innovative and collaborative partnerships with Indigenous governments to improve a project's economic outcomes and share project benefits.

Although these initiatives provide important mechanisms to address the social impacts of projects, they do not necessarily apply an Indigenous and/or gender lens. Industry-led initiatives are not necessarily responsive to the needs of the most vulnerable in communities and are not substitutes for social services.

s.13

- Encouraging the application of IGBA lens to Impact Benefit Agreements in order to consider the range of gender and social impacts a camp might have on a community;
- Providing IGBA education and awareness training to industry associations, companies, contractors and service providers;
- Developing Social Impact Assessor professional qualifications, competencies and/or standards that include IGBA training and expertise; and,
- Developing corporate responsibility best practices. Smaller companies or camp contractors may not have the capacity to develop their own policies regarding corporate responsibility and may rely on standards and policies set by leaders in the industry. Government could partner with industry to develop best practices and corporate responsibility agreements encouraging the companies to follow the principles of IGBA.

Industry has an interest in attracting quality employees and the support of local communities that neighbour their operations. Working together to improve how industrial work camps are managed and operated will reduce the negative social outcomes being experienced by Indigenous women and children and provide improved working conditions to attract and retain a qualified workforce.

C.4 Legislation, regulatory reform and policy tools

C.4.1 Current regulatory environment

Industrial camps operate under a patchwork of regulations; with no single authorizing body (see [Appendix 2](#)). There is no single legislative or regulatory authority that is responsible for addressing the spectrum of social impacts of industrial camps on host or proximate communities (Table 1).

The *EAA* requires the consideration of the potential social impacts of proposed major projects, however there is room for improvement in regard to how the impacts identified in this paper are considered. EAs do not typically include the application of a gendered lens to considerations of impacts on vulnerable populations such as Indigenous women, although there are no provisions in the *EAA* that would prohibit the use of such an approach. Table 1 shows that although there are many regulatory touch points with camps, and workers employed in camps, there are few mechanisms to address social impacts outside of consultation with affected Nations and the EA process.

Table 1: Challenges in leveraging existing non-EA regulations to address social and gender impacts

Ministry or Agency Responsible	Legislation/Regulation	Challenge or ability to address social impacts:
Ministry of Health	<i>Industrial Camps Regulation:</i> <ul style="list-style-type: none"> • Focuses on biophysical sanitation requirements (e.g., sanitation, drinking water quality, and safe and sanitary housing) • Applies to camps with a population of 5 or more. Applies to the largest number of camps • Does not require a permit specific to camps, 	<ul style="list-style-type: none"> • May not legally enable considerations of impacts on host communities • Limited/no authority to address mental health, social determinants of health, or well-being of workers and host communities. • Does not include workers housed in lodges, hotels, motels or other temporary accommodations that are not classified as

Ministry or Agency Responsible	Legislation/Regulation	Challenge or ability to address social impacts:
	but camps are required to have permits for drinking water and sewage, if operated independently from any other systems	traditional industrial camps
Human Rights Tribunal	Human Rights Code: <ul style="list-style-type: none"> Provides protection of human rights including provisions against discrimination 	<ul style="list-style-type: none"> Focus on employment, housing etc. not discrimination and racism experienced in day-to-day
Ministry of Labour	Occupational Health and Safety Regulation (OHSR): <ul style="list-style-type: none"> The purpose of the OHSR is to promote occupational health and safety and to protect workers and other persons present at workplaces from work-related risks to their health, safety, and well-being 	<ul style="list-style-type: none"> Limited treatment of mental health and workers' well being No provisions for host communities Limited inclusion of off-duty worker time in camps
Ministry of Labour	Employment Standards Act: <ul style="list-style-type: none"> Ensures that employees in B.C. receive at least minimum standards of compensation and employment 	<ul style="list-style-type: none"> Limited treatment of mental health and workers' well being No provisions for host communities
Environmental Assessment Office	Environmental Assessment Act: <ul style="list-style-type: none"> Enabling legislation Flexible approach to working with Indigenous governments Currently going through a revitalization process that will likely result in changes to the legislation and supporting regulation and policy Developing socio-economic EA process tools 	<ul style="list-style-type: none"> Limited social and health legislation and regulation to inform EAs, direction to proponents and EA certificate conditions Challenges identifying and accessing cross government social impacts expertise to support project working groups Attributing adverse effects to a specific project
Ministry of Environment and Climate Change Strategy	Permits, Environmental Statutes, Land Use: <ul style="list-style-type: none"> See Appendix 2 	<ul style="list-style-type: none"> No framework or obligation to address social issues
Ministry of Energy, Mines and Petroleum Resources	Mines Act The Health, Safety and Reclamation Code for Mines in British Columbia outlines requirements for: <ul style="list-style-type: none"> "lunchrooms and sanitary conveniences," including lunchrooms, toilet facilities, washing water temperatures, piping, etc. exploration camps, generally relating to cleanliness and reclamation. 	<ul style="list-style-type: none"> There are no specific provisions under the Code that outline requirements to consider social impacts Many of the requirements under the Code require compliance with regulations under the jurisdiction of other agencies (e.g. ICR).
Forests, Lands, Natural Resource Operations and	Land Act tenures for work camps are authorized under the following operational policies. For example:	<ul style="list-style-type: none"> Land Act tenure applications for industrial camps are referred to First Nations for consultation on Aboriginal rights and title; this consultation process can also be used as

Ministry or Agency Responsible	Legislation/Regulation	Challenge or ability to address social impacts:
Rural Development	<ul style="list-style-type: none"> • <u>Industrial</u> • <u>General Commercial</u> 	<p>an opportunity to address some of the social issues; i.e.</p> <ul style="list-style-type: none"> ○ the siting location of the proposed camp, ○ A third-party memorandum of understanding between the tenure holder and First Nations community regarding communications etc. <ul style="list-style-type: none"> • The operational policies for industrial and general commercial purposes could reference the policy re: Indigenous Communities and Industrial Camps.
Oil and Gas Commission	<p><i>Land Act</i></p> <ul style="list-style-type: none"> • As a single-window regulator for oil and gas activities in B.C., the OGC has authority to issue permits for related activities under specified enactments, including the <i>Land Act</i>. The application process requires Indigenous consultation, rights holder engagement, environmental and archaeological assessments. 	<ul style="list-style-type: none"> • Involves Indigenous consultation regarding the location of the camp but does not address its continued operation (e.g. sanitation, policies regarding worker codes of conduct or behaviour, policies, health services). Approvals are required from other jurisdictions in order to construct facilities and operate the camp.^{xxvi}

C.4.2 Opportunities for improvement

Regulatory tools could be used in conjunction with non-regulatory tools to compel industry to consider social impacts of their projects and to change the way that social impacts are managed. Compliance and enforcement of any proposed regulations should also be considered as staffing capacity in rural areas, where many camps are located, can be very limited. Adapting regulations and decision-making processes should aim to identify and break down barriers to give a voice to Indigenous women throughout the engagement, consultation, policy development, permitting and decision-making processes.

For example, changing workplace health and safety regulations could also have a positive impact by proactively preventing social impacts, for example:

- Applying health and safety provisions outside of work hours;
- Including provisions related to mental health and worker wellness; and,
- Changing requirements related to the number of hours and consecutive days (drive in drive out/fly in fly out) workers can work.

Provincial and federal commitments to reconciliation and implementing UNDRIP, the TRC Calls to Action, and relevant case law, have led to increased opportunities for shared decision-making for all decision-

making processes in the Province and recognition of Indigenous jurisdiction over their territories and peoples. This change in cross government approach will also need to be reflected in any potential legislative or regulatory changes related to industrial camps. Changing the approach to regulating industrial camps may need to reflect and respond to desires for more community led assessments and monitoring for major projects and other activities. These are long term and fundamental shifts in how industrial camps are permitted; operated and managed that will require long term solutions^{xxvii}.

C.4.2.1 Environmental assessment process

In July 2017, Minister Heyman of the Ministry of Environment and Climate Change Strategy (ENV), received a letter from Premier Horgan with a mandate to revitalize the EA process that will likely result in changes to the B.C. EAA and the supporting regulation and policy:

“Revitalize the Environmental Assessment process and review the professional reliance model to ensure the legal rights of First Nations are respected, and the public's expectation of a strong, transparent process is met”^{xxviii}.

The EAO is planning for a revitalized EA to come into force in the winter of 2019. Through EA revitalization, there is an opportunity to consider whether criteria should be established in the Reviewable Projects Regulation to require EAs for larger worker camps and to identify the appropriate guidance that would be needed to support the consideration of impacts to Indigenous communities in general and women and children in particular. The EAO would also need access to greater expertise on social impact assessment. EA revitalization could also consider changes to compliance and enforcement of EA Certificate Conditions that would support an adaptive approach to responding to community concerns.

C.4.2.2 Industrial Camps Regulation

The Ministry of Health (MOH) is responsible for the ICR^{xxix}, which falls under the *Public Health Act*. The ICR has provisions for the health and safety of work camps and focuses on the biophysical sanitation requirements such as sewage requirements and the provision of safe drinking water. The mental health, social determinants of health and well-being of workers or host communities does not fall under the ICR.

MOH is undertaking a review of the ICR and is considering a broad scope, but it is not yet clear if or how social impacts could be addressed under this regulatory tool.

Health Authorities are responsible for compliance and enforcement of the ICR. Northern Health has highlighted the challenges in meeting current compliance and enforcement requirements, in part due to its large geographic area with extensive resource industry activity, the number of remote and disparate camp locations and data management systems that do not have Geographic Information Systems capability. Environmental Health Officers are trained to inspect biophysical and sanitation conditions and relevant water and food handling permits.

Multi-day travel on remote logging or forest service roads may be required to access a single camp, which the health authority has limited funding and capacity to do for conducting inspections. In addition, addressing social impacts is multi-disciplinary, and may not be fully addressed within the responsibilities of a health authority.

The Northern Health has created a best management guide for industrial camps to create health and medical service plans^{xxx} that go beyond the minimum legislated (*ICR, Mines Act, WorkSafeBC*, etc.) requirements and seek to better address the impacts to local health services associated with increased industrial activities, while also supporting the health of camp workers. The guidance helps to manage not only worker safety risks, but also non-occupational, non-urgent health care service needs, such as primary care mental health services, sexual health supports and health promotion. A Communicable Disease Plan Best Management Guide for Industrial Camps^{xxxii} and additional harm-reduction recommendations for industrial camps^{xxxiii} were also recently released as supplemental guidance.

C.4.2.3 Health and safety

The social determinants of health^{xxxiii} are vital factors to reducing the burden of disease and injury and to limiting disparities in health and well-being both between individuals and amongst various segments of the population. Regulations and standards regarding public health and worker safety do not reflect this emerging priority (See [Appendix 2](#) for examples).

The social determinants of health and more holistic definitions of well-being extend beyond the purview of any single regulatory authority (e.g., WorkSafeBC is responsible for safety at work) or Ministry (e.g., MOH, which does not determine employment or social programming) creating challenges to addressing underlying or systemic drivers of health disparity. Factors affecting the well-being of workers in camps have spillover effects on worker behaviour offsite and outside work. These factors are outside of the definition of health and safety as defined by current regulations and can result in negative impacts on Indigenous women and communities in general. There is a need for an expansion of the definition of health and safety to extend to the well-being for workers and to the social determinants of health for the communities that are nearby to industrial camps.

C.4.2.4 Coordinated planning

There are few venues where agencies and ministries can create relationships and partnerships, share information, and collaborate on initiatives related to the social impacts of natural resource extraction and economic development. There are limited opportunities for communities to engage with provincial authorities and industry on issues related to social impacts, and the onus is often on communities to raise and flag areas of concern.

Communities impacted by trauma may have many urgent and immediate needs leading to limited capacity to identify and address problems or participate in planning and engagement processes^{xxxiv}. The current regulatory approach puts the onus on communities, through consultation and engagement, to

identify and flag areas of concern. Communities most impacted by trauma are not well-positioned to flag social issues as areas of concern.

Various planning models were considered to facilitate information sharing within the different provincial entities involved in regulating industrial camps, with other levels of government and Indigenous communities and with industry. These models included Regional Growth Strategies (B.C. Ministry of Municipal Affairs and Housing, FLNR), cross agency Indigenous relations teams, or industry-led socio-economic tables. These venues could be used to communicate with agencies and communities about a proposed camp and to address concerns before, during and after a camp is in operation. Promising initiatives that could integrate information on camps and take an Indigenous gender-based lens includes FLNR's mandate to undertake land use planning processes. MIRR is recreating the interagency Regional Management Committees, which could also be a forum for inter-agency communication on industrial camps.

However, creating planning forums have a number of limitations which include:

- Too narrow or too broad of focus: Planning forums and tables are typically created for a specific purpose and may have too narrow of a focus (i.e., focus only on select social issues or mandates) or too broad of a focus (focusing on social issues among varying other values, such as environmental, economic, land use planning, etc.) unless designed specifically for this issue;
- Lack of capacity: Planning forums and tables are typically created for a specific purpose and may not have the scope of representation required. Many times, the same people and organizations are asked to engage in different tables and experience limitations in their capacity to participate; and,
- Long and costly: Setting up new models that engage all of the necessary sectors and cover the entire province would be a long and costly process.

Convening people in person is costly. In-person, semi-regular meetings may not be appropriate to camps that are small or highly temporary in nature. Large camps, or those associated with large projects are more likely to have the financial and human resources capacity to engage with Indigenous communities and government. Planning tables and processes should therefore be appropriately scaled to the size of camp.

C.4.2.5 Coordinated strategy

Government has a variety of strategies that could be adapted to include planning for industrial camps. For example, the Rural Economic Development Strategy, coordinated by FLNR, seeks to work with rural communities to strengthen resilience, create jobs and build economic opportunities. The Rural Advisory Council and Rural Dividends program supports these goals. Although many of the identified strategies address one or more components or issues related to camps, there is no one over-arching strategy that would be an appropriate fit for the coordination and planning that would be required for industrial camps of all sectors, sizes and locations across the province while incorporating the unique considerations of Indigenous communities and women.

There are a number of existing organizations and government agencies that offer support or prevention services to and for Indigenous women and children. Government could provide funding to increase available supports to managing the impacts of industrial camps. The Community Coordination for Women's Safety run by Ending Violence Association of BC (EVA BC), assists communities to develop new models or improve cross-sector coordination of responses to violence against women. Violence Against Women in Relationships, run by EVA BC; coordinated work with Indigenous communities and across government on the Social Determinants of Health; and, Integrated Case Assessment Teams run by The B.C. Ministry of Children and Family Development are all efforts to improve coordination and policy responses of various sectors and people involved in preventing and responding to violence.

The Aboriginal Liaison Program (ALP), coordinated by FLNR, OGC and EMPR, also links training opportunities and monitoring of natural resource projects with Indigenous communities. Specifically, ALP agencies partner with Indigenous groups to develop liaison and monitoring projects tailored to their interests, concerns, and technical capacity. The ALP supports creating greater Indigenous community awareness of natural resource development, safety, environmental and emergency management, and restoration activities by providing for liaisons within the community. Programs like ALP can be used as a model for addressing social impacts of resource development, focusing on opportunities for community-based responses to violence against women, and other impacts of resource development.

C.5 Supporting Indigenous women and children through community funding and social services

Funding for health authorities and social services (provided by regional authorities, municipalities, provincial agencies, etc.) are determined using information on permanent, resident populations and does not account for higher demand from transient camp and non-camp workers operating in the region^{xxxv}. It has been suggested that camp workers contribute to inequity in health services available to rural/remote populations and that transient workers put a potential strain on available health and social resources when accessing these services^{xxxvi}. Industrial camps and boom-bust resource economies can also put increased demands on particular services (i.e., drug and alcohol counselling, sexual assault response) while rapid swings in economic and demographic conditions associated with boom-bust resource economies can be hard to accommodate, even when funding is available. Widening income inequality, rising costs of living, increased instances of sexual violence and other social impacts in areas of intense resource development also likely result in increased service needs for the permanent population.

Although camps are dispersed across B.C., Northern Health is responsible for an area with a high proportion of industrial activity and camps. This region is geographically large, and work camps are dispersed across large areas. Recruiting and retaining health care professionals to remote and rural areas can be difficult. This can be even more difficult in areas of high industry activity due to the associated high costs of living and competition from industry offering high wages. Ensuring all populations have access to services can therefore be challenging.

As a result, camps that do not provide amenities may place a strain on the proximate community. The additional demand for services created by industrial camps can negatively impact both camp workers' and Indigenous communities' access to services.

Indigenous communities have limited funding and capacity to prepare for, prevent or monitor and adapt to impacts in their communities, including to conduct safety planning, family, financial, harm reduction or anti-violence programming and monitoring related to proposed or active camps in their territories. Limited social programs (beyond employment and training) are available to respond to the social impacts of resource development from a holistic perspective and program funding is often only available on a year to year basis which can limit the effectiveness of program delivery. Allocating resources to communities can enable initiatives specific to local contexts and projects, and have direct positive impacts on people in communities. These investments support the governance and institutional capacity of communities for co-management of the impacts of resource development, and informed co-decision on proposed projects in their territories.

Initiatives that could assist in addressing the challenges associated with the delivery of health and social services include:

- Ensuring that services are designed to maximize the continuity of care for workers. Transient workers should have access to services both during their camp stay and while in their home community;
- Leveraging existing programs and services that support women by offering dedicated long term funding, especially in regions of high industrial activity; and,
- Including social services support in Impact Benefit Agreements (IBAs);
- Developing alternative funding arrangements for health and social service agencies to account for the service needs of non-resident populations and are proportionally allocated dependent on the capacity level of the health authority relative to the volume and scale of the industrial projects in the region;
- Working with communities to identify health and social service needs that reflect the realities of fluctuating impacts of industrial development;
- Providing enhanced funding (from the Province or through industry partnerships) to relevant organizations and entities:
 - Partnering with organizations and entities to provide funding for services in areas of high industrial activity that considers transient populations. Funding for services should be flexible to adapt to rapid fluctuations in transient work populations and increased burden on existing services and infrastructure;
 - Health and social agencies can be well positioned to work with industry, relevant provincial permitting ministries and agencies and indigenous communities to address some of the impacts identified here. However, they often have limited capacity and undefined mandates in this area. For instance, the Northern Health's Office of Health and Resource Development holds relationships with various stakeholders on some of these issues, but their effectiveness and abilities are limited by capacities, often

- requiring them to risk manage between different processes and initiatives (e.g., EA process, permitting, provincial initiatives, etc.);
- Some health authorities have expertise in relation to the impacts of resource development on health and /or key partnerships with academic institutions.
- Making funding available for community preparedness coordinators for Indigenous communities that are in close proximity to large camps. Preparedness coordinators could provide links to existing initiatives and improve coordination, collaboration and information sharing when responding to sexual assault cases (e.g., Sexual Response Assault Teams and Sexual Assault Community Protocols).

D. Conclusion

The social impacts of natural resource development and accompanying industrial camps, including gendered impacts, extend beyond the mandate of any one ministry or agency and addressing them will require a collaborative and coordinated approach. A number of issues were identified by the Working Group and in initial targeted scoping conversations. While there are some issues identified in this paper that individual ministries could address to enhance prevention and management of social impacts, some issues require long term and fundamental shifts in the way industrial camps are permitted, operated and managed. Prioritizing and scoping actions to address these concerns would require dedicated capacity and in-depth engagement to capture the diverse experiences of Indigenous and non-Indigenous communities proximate to industrial camps and to ensure that actions and changes are developed with, and are responsive to, the needs of Indigenous peoples, communities, and industry.

Coordination is needed with priority initiatives already underway across the province (i.e., EA revitalization and development of GBA+ in B.C.). As a cross sector and emergent issue, additional analysis requires a whole of government and iterative approach, in collaboration with Indigenous governments and peoples, industry, municipal and federal governments, and service providers and agencies.

Development of provincial actions will require endorsement by Provincial Deputy Ministers, significant coordination across ministries and further engagement with Indigenous women, Indigenous organizations, industry, external organizations and local government and service providers.

The process in developing this Discussion Paper also identified a lack of understanding of current camp management practices and related corporate policies. Deputy Ministers have endorsed the development of a case study with major project proponents. The intent of the case study is to investigate and inform the Province as to what tactics and best practices can be used for consideration of future regulatory improvements, regarding the planning and operation of industrial work camps in BC. The case study will also provide an opportunity to engage individuals including local government and First Nations representatives, Indigenous women, primary contractors, provincial entities and others as identified that participated in the development of industrial camp planning measures. Engagement will aim to

explore their views on what works well in the current process of planning for industrial work camps, and opportunities for future improvement. The case study will conclude with an analysis of this information and explore gaps and opportunities on how the Province, First Nations and industry can work together towards continuous improvement and identify how concerns related to industrial work camps can be addressed.

The case study also represents a potential opportunity to explore new opportunities for piloting new approaches during the potential construction phases of the proponent's projects.

In addition, Deputy Ministers have endorsed MIRR to continue working with line ministries to articulate, align and leverage activities already underway across government to better consider the social and health impacts of industrial camps on Indigenous communities. Findings from both the case study and MIRR's continued policy scoping work will be presented to Deputy Ministers in early 2019.

Endnotes

ⁱ Aalhus, M. (2018). The social determinants of health impacts of resource extraction and development in rural and northern communities: A summary of impacts and promising practices for assessment and monitoring. Prepared for Northern Health and the Provincial Health Services Authority

ⁱⁱ The definition of industrial camps in the Discussion Paper is based on the definition provided in the *BC Guidelines for Industrial Camps Regulation* but differs with the inclusion of accommodations provided by a third party supplier. The ICR specifies it does not apply to third party supplier accommodation or amenities as they are regulated in the same manner as hotels.

ⁱⁱⁱ Workers housed in an industrial camp are referred to as worker residents in this paper.

^{iv} Aalhus, M. (2018). The social determinants of health impacts of resource extraction and development in rural and northern communities: A summary of impacts and promising practices for assessment and monitoring. Prepared for Northern Health and the Provincial Health Services Authority; and, https://www.northernhealth.ca/Portals/0/Your_Health/Programs/Public%20Health/OfficeHealthResourceDevelopment/impacts-and-promising-practices-for-assessment-monitoring.pdf; and, First Nations Health Authority and Northern Health (2015). Health and Resource Development Impacts and Overview; Northern First Nations Caucus Overview of Sub-regional Engagement Sessions, <http://www.fnha.ca/Documents/FNHA-Northern-First-Nations-Caucus-Overview-Fall-2015-Full-Report.pdf>

^v These include positive and negative impacts to employment and income; formal and informal economic activities; work conditions; food security; housing and cost of living; pressure on health care systems; education; connections to the land and waters; cultures; life control, self-determination, and self-governance; social relationships; mental health, substance use, and family dynamics; community safety and crime; sexual health, sex work, and sex trafficking; and gender.

^{vi} Jones, E. (2017). 'No free, prior and informed consent': Rape culture in boom and bust towns. Discourse Media. <http://discoursemedia.org/gender-and-identity/Indigenous-women-violence-resource-extraction> & Jones, E.

(2018) Violence against women in Canada: We have national data, and we're sharing it. Discourse Media.

<https://www.thediscourse.ca/gender/violence-against-women-canada-data-sharing>

^{vii} TRC (2015), as cited in the Firelight Report, pg. 8.

^{viii} The Firelight Report

^{ix} Government of Canada (2018). Budget 2018's Gender Results Framework.

<https://www.budget.gc.ca/2018/docs/plan/chap-05-en.html>

^x Minister's Advisory Council on Indigenous Women,

<https://www2.gov.bc.ca/gov/content/governments/Indigenous-people/minister-s-advisory-council-on-Indigenous-women-maciw/maciw-vision-mission>

^{xi} University of Northern British Columbia. Community Development Institute (2015a): "Lessons Learned in Work Camp-Community Relations: Practices Making a Positive Difference"

[http://www.unbc.ca/sites/default/files/news/40513/lessons-learned-work-camp-community-relations-practices-making-positive-difference/lessons learned in work camp-community relations - final march 2015.pdf](http://www.unbc.ca/sites/default/files/news/40513/lessons-learned-work-camp-community-relations-practices-making-positive-difference/lessons%20learned%20in%20work%20camp%20community%20relations%20-%20final%20march%202015.pdf)

^{xii} Applications for industrial camps under the *Land Act* are referred to First Nations for consultation. This could provide an opportunity to discuss issues with regard to siting location of a proposed camp.

^{xiii} Source: Status of Women Canada. (2014). *The peace project: gender-based analysis of violence against women and girls in Fort St. John*.

https://thepeaceprojectfsj.files.wordpress.com/2014/03/the_peace_project_gender_based_analysis_amended.pdf

^{xiv} This could be linked to a Worker Code of Conduct or serve as a reminder to camp workers renting in town about their responsibilities under the *Residential Tenancy Act*.

^{xv} This does not include smaller, more transient camps that are difficult to track (e.g. exploration, silviculture). With the exception of logging camps, it is not known which camps are active, proposed for future development or retired and inactive. Northern Health (2012). Part 1: Understanding the State of Industrial Camps in Northern BC: A Background Paper.

<http://lninnorthernbc.ca/images/uploads/documents/UnderstandingStateofIndustrialWorkCamps-NorthernHealth-Oct2012.pdf>

^{xvi} This map uses three datasets on DataBC and information provided by FLNRORD replicating Northern Health's Methodology. For more details see Fionda, F. & Jones, E. (2018). In search of Canada's elusive shadow population.

<http://discoursemedia.org/data/canadas-shadow-population>

^{xvii} Northern Health stresses that their information on camps is incomplete and to use these numbers with caution. The data only represents camps that have applied for permits and does not represent the total number of camps in the region or camps that are active.

^{xviii} See <http://lodgeline.com/> for a diverse suite of accommodations used by mobile workforces.

^{xix} Aalhus, M. (2018). *The social determinants of health impacts of resource extraction and development in rural and northern communities: A summary of impacts and promising practices for assessment and monitoring*. Prepared for Northern Health and the Provincial Health Services Authority.

^{xx} Indicators should reference the broader social determinants of health. The Office of the Provincial Health Officer has developed 22 indicators that could be used. Regional Health and Wellness plans developed by First Nations could also inform these indicators.

^{xxi} BC Chamber of Commerce (2014). "Industrial Camps Near or Within Municipalities and their Effects on the Economy." *BC Chamber of Commerce Policy*. <http://www.bcchamber.org/policies/industrial-camps-near-or-within-municipalities-and-their-effects-economy>

^{xxii} Truth and Reconciliation Commission of Canada. (2014). Truth and Reconciliation Commission of Canada: Calls to Action. http://www.trc.ca/websites/trcinstitution/File/2015/Findings/Calls_to_Action_English2.pdf

^{xxiii} Trauma is a set of normal human responses to stressful and threatening experiences.

^{xxiv} The Minister of Environment and Climate Change's Mandate letter includes the mandate to revitalize the Environmental Assessment Process.

^{xxv} Government of Canada (2015). Corporate Social Responsibility (CRS) Checklist for Canadian Mining Companies Working Abroad. <http://www.nrcan.gc.ca/mining-materials/mining/corporate-social-responsibility/17152>

^{xxvi} Approval from Other Jurisdictions for Camps Guidance <https://www.bcogc.ca/node/13338/download>

^{xxvii} For instance, in Australia, multiple parliamentary inquiries at the State and Federal level included widespread engagement and input from industry and expert witnesses to put forward recommendations and, in some cases, new legislation to improve Fly-in-Fly-out and Drive-In-Drive-Out practices across the country.

^{xxviii} <https://www2.gov.bc.ca/assets/gov/government/ministries-organizations/premier-cabinet-mlas/minister-letter/heyman-mandate.pdf>

^{xxix} The ICR applies does not apply to camps with fewer than 5 people and that are established to meet emergency conditions and occupied for a period of not more than 7 days.

^{xxx} https://www.northernhealth.ca/Portals/0/Your_Health/Programs/Public%20Health/OfficeHealthResourceDevelopment/2015-03-HMSP.pdf

^{xxxi} https://northernhealth.ca/sites/northern_health/files/services/office-health-resource-development/documents/communicable-disease-control-BMG.pdf

^{xxxii} https://northernhealth.ca/sites/northern_health/files/services/office-health-resource-development/documents/overdose-prevention-camps.pdf

^{xxxiii} The determinants of health are a mix of social, economic and personal factors that can work together or independently to influence the ability of people to make lifestyle choices, sometimes positively and sometimes negatively. They include income/social status; social support networks; education; employment/working conditions; social environments; physical environments; personal health practices and coping skills; healthy child development; biology and genetic endowment; health services; gender; and culture. From: Provincial Health Officer. Investing in prevention: improving health and creating sustainability. The Provincial Health Officer's special report. Victoria, BC: Ministry of Healthy Living and Sport; 2010 Aug.; and, Public Health Agency of Canada. What makes Canadians healthy or unhealthy? Ottawa, ON: Public Health Agency of Canada [modified 2003 Jun 16; cited 2012 Oct 9]. Available from: <https://www.canada.ca/en/public-health/services/health-promotion/population-health/what-determines-health/what-makes-canadians-healthy-unhealthy.html>

^{xxxiv} Weinstein, Wolin and Rose (2014) argue "trauma manifests at the family and community level by altering social networks and reducing community capacity to collectively identify and address its problems and plan for its future. Trauma can undermine "readiness" for individual and community change" (p.7)

^{xxxv} Note: municipalities in Northeastern BC receive additional funding to compensate for the impacts of resource development. These agreements funded local governments, do not consider the potential gendered impacts or service requirements of resource development and did not explicitly allocate funding for Indigenous service provision.

^{xxxvi} For example, by displacing resident populations through reduced housing availability, access to common services etc. see Northern Health (2015) Health and Medical Services Plan Best Management Guide for Industrial Camps. https://northernhealth.ca/sites/northern_health/files/services/office-health-resource-development/documents/industrial-camps-BMG.pdf

Appendices

Appendix 1: Ministries, Agencies and Organizations represented on the Working Group as of September 2018

- Energy, Mines and Petroleum Resources
- Indigenous Relations and Reconciliation
- Municipal Affairs and Housing
- Advanced Education and Skills Training
- Labour
- Children and Family Development
- Health
- Forest, Lands, Natural Resource Operations and Rural Development
- Public Safety and Solicitor General
- Transportation and Infrastructure
- Environmental Assessment Office
- BC Hydro
- WorkSafeBC
- Lake Babine Nation
- Nak'azdli Whut'en
- Minister's Advisory Council on Indigenous Women
- Northern Health
- Gender Equity Office at Ministry of Finance
- Oil and Gas Commission

Appendix 2: Applicable Regulations to Industrial Camps

Factors determining applicable regulations

Project Size: Thresholds outlined by the *EAA* determine whether a project is reviewable. If yes, social impacts are considered in the EA Process.

Camp Size: Camps over 5 people are regulated by the *Public Health Act* - ICR.

Type of Land: Permits are required for Crown and Agricultural Reserve Land. If projects require land use permits, conditions can be set out for these uses. Camps on Private lands do not require the same permitting.

Local government: Municipal and Regional Districts have the authority develop by-laws impacting camp operations and permit requirements.

Industry: Camps associated with different industries have different requirements, e.g. temporary camps can be authorized through the *Mine's Act*.

Location of Camp in project area: Camps within the Mine Fence Area are under the *Mines Act*, but the *Mines Act* does not oversee bunk houses, which are regulated under the This jurisdictional overlap causes confusion for compliance and enforcement.

Amenities of Camp: Water, food handling, and sewage permits are necessary for camps of varying sizes.

Location of Camp/Land Use on Traditional Territories: Consultation and accommodation with Indigenous governments is required for certain land use decisions.

Discussion of regulations

Industrial camps over 5 people, and not used for emergency purposes are regulated through the *Public Health Act*- Industrial Camps Regulation (*BC Reg 417/83*)¹, which focuses on the personal hygiene, sanitation, and biophysical safety of industrial camps (e.g., dwelling size, availability and specifications of washing facilities, sewage and water). ENV has responsibility or authority under more than 30 statutes, many of which relate to industrial camps (p.66²). FLNR is responsible for issuing permits to mining, forestry, and oil and gas companies operating on Crown Lands for a range of activities such as tenure

¹ Government of British Columbia. REG 417/83. Industrial Camps Regulation- *Public Health Act*. http://www.bclaws.ca/civix/document/id/loo99/loo99/70_2012

² W. Beamish Consulting Ltd. & Heartwood Solutions Consulting (2013). "Policy, communications, capacity: A time to lead. Scoping the impacts and benefits of work camps in the Peace Region" *Prepared for Peace River Regional District*. http://prrd.bc.ca/board/agendas/2013/2013-15-8827692533/pages/documents/4bPolicyCommunicationsCapacity-Atimetolead_June25_001.pdf

and clearing.³ The OGC has authority under specified enactments to review the location of oil and gas camps on Crown Land and issue permits related to tenure and associated environmental considerations.

In addition, projects operating within municipal or regional district boundaries may be subject to by-laws that vary across jurisdiction, making it difficult to compile the necessary permits and licenses a hypothetical project might require. Further variation in the permitting and licensing process is introduced when comparing projects from different sectors. For instance, major mineral developments, and peripherally the camps associated with these projects, are permitted through EMPR, who coordinate a review panel in determining provincial authorization of a project, which differs from oil and gas, which is permitted through OGC. This leads to limited coordinated oversight, challenges with jurisdiction for enforcement and compliance, and inconsistent approaches (see Table 2 for more details on factors determining applicable regulations).

Table 2: Regulations and Legislation Applicable to Industrial Camps (compiled from W. Beamish Consulting Ltd & Heartwood Solutions Consulting (2013); OGC (2016); and BC government staff)

Note: this is not an exhaustive list rather here to demonstrate the number of touchpoints and authorities that can be involved in permitting and oversight.

Regulation/Legislation	Enforcing Agency	Application to Work Camps
<i>Sewage Disposal Regulations (BC Reg 411/85)</i>	MOH Health Protection Branch, Health Authority, Environmental Health Office	Primary legislation applying to all industrial camps >5 people
<i>Drinking Water Regulations (BC Reg 230/92)</i>	MOH Health Protection Branch, Health Authority, Environmental Health Office	Primary legislation applying to all industrial camps >5 people. Drinking water requirements for human consumption, food preparation or sanitation
<i>Food Premises Regulation (BC Reg 210/99)</i>	MOH Health Protection Branch, Health Authority, Environmental Health Office	Primary legislation applying to all industrial camps >5 people, Food intended for public consumption
<i>Public Health Act, Sewerage System Regulation</i>	MOH, Health Protection Branch, Health Authority	If effluent does not exceed 22,700 litres/day or is reused. Camps under 100 people
<i>Environmental Assessment Act</i>	ENV- EAO	When projects are over legislated thresholds
<i>Environmental Protection Act</i>	ENV	E.g., when there is presence of

³ Ibid, p 69.

		or planned industrial waste
<i>BC Electrical Safety Act</i>	Technical Safety BC	
<i>Building Act / BC Building Code</i>	Local governments (where building inspections services exist)	Applies to any buildings other than temporary site offices and seasonal storage buildings. Includes requirements for factory built modular housing or buildings.
<i>Workers Compensation Act & Occupational Health and Safety Regulation</i>	WorkSafeBC	For workers on site, as well as camp planning, e.g., when storing or handling flammable substances. <i>Part 25 Specific to Camps</i>
<i>Fire Services Act</i>	BC Fire Commission	Storing fuel or re-fuelling facilities
<i>Water Sustainability Act</i>	ENV, Regional Water Management Branch, Health Authorities	If water for camp operation is taken from any surface source other than a well, a licence for long term operations or approval for operations up to 12 months is required
<i>Environmental Management Act- Municipal Sewage Regulation</i>	ENV, Environmental Protection Office	If effluent exceeds 22,700 litres/day and is not reused
<i>Environmental Management Act- Spill Reporting Regulation</i>	ENV, Regional Environmental Protection Office, Regional Waste Manager	E.g., if there are spills or soil contamination and waste disposal
<i>Environmental Management Act- Open Burning Smoke Control Regulation</i>	ENV- Environmental Protection Office	E.g., when burning waste (for disposal)
<i>Environmental Management Act- Hazardous Waste Regulation and Legislation Guide</i>	ENV, Regional Environmental Protection Office	Generation, storage and transport of waste
<i>Litter Act</i>	ENV	
<i>Landfill Criteria for Municipal Solid Waste</i>	ENV	
<i>Oil and Gas Waste Regulation</i>	ENV	
<i>Waste Discharge Regulation</i>	ENV	
<i>Forest Act</i>	FLNR/OGC	Removal of Crown timber within the activity area
<i>Forest and Range Practices Act</i>	FLNR	

<i>Environment and Land Use Act</i>	FLNR	
<i>Land Act</i>	FLNR/OGC	Occupation and use of Crown Land. <i>Land Act tenures for work camps are authorized under the following operational policies; i.e.</i> <ul style="list-style-type: none"> • <u>Industrial</u> • <u>General Commercial</u>
<i>Land Titles Act</i>	FLNR	
<i>Mines Act- Health, Safety and Reclamation Code for Mines</i>	EMPR	The Health, Safety and Reclamation Code for Mines in British Columbia outlines requirements for: <ul style="list-style-type: none"> • “lunchrooms and sanitary conveniences,” including lunchrooms, toilet facilities, washing water temperatures, piping, etc. • exploration camps, generally relating to cleanliness and reclamation.
<i>Petroleum and Natural Gas Act</i> <i>Oil and Gas Activities Act</i>	OGC	Issue permits for Oil and Gas activities on Crown Lands. Camps sites are regulated under specific legislation including the Land Act, Forest Act, etc.

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Indigenous Communities and Industrial Camps: Discussion Paper

Version 6 January 2019

Final Draft

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Executive Summary

During the negotiation of Pipeline Benefits Agreements in 2014-15, the Lake Babine and Nak'azdli Whut'en First Nations raised concerns regarding the social impacts of proposed industrial work camps associated with the construction of the Coastal GasLink and Prince Rupert Gas Transmission projects. These two projects contemplated the construction of up to 30 camp facilities during the project lifecycle.

In response to these concerns, the Ministry of Indigenous Relations and Reconciliation (MIRR) and the Ministry of Energy, Mines, and Petroleum Resources (EMPR) provided funding to the Lake Babine Nation and Nak'azdli Whut'en to examine the social impacts of industrial camps and to identify mitigation strategies. *Indigenous Communities and Industrial Camps: Promoting Healthy Communities in Settings of Industrial Change* (The Firelight Report), written with the Firelight Group, was submitted in February 2017 to the First Nations Summit. The Firelight Report highlights the negative social impacts that industrial camps can have on nearby Indigenous communities, and in particular on Indigenous women and children including:

- Increased substance use;
- Increased demand for sex work and higher risks of sexual exploitation;
- Increased economic inequality (high wages of workers vs. low wages of Indigenous women);
- Increased costs of living, and food and housing insecurity; and,
- Decreased ability to connect with Indigenous governance and health/wellness practices such as hunting, fishing, berry picking, etc.

The Firelight Report suggests that industrial camps must be managed and operated in a manner that protects and promotes the health and well-being of the employees at the camps and prevents potential negative social impacts on nearby communities and especially on vulnerable populations.

In March 2017, a broad group of both social and natural resource sector Deputy Ministers struck a cross ministry Working Group (the Working Group) to review the report and develop recommended actions. While the Working Group's mandate focussed initially on impacts associated with liquefied natural gas (LNG) pipelines it was quickly recognized that industrial camps are common across the natural resource sector. As a result, the scope of the project expanded to include the impacts of industrial camps province-wide (i.e., camps associated with forestry, mining, and other oil and gas developments), with a focus on Indigenous women and children in northern British Columbia (B.C.). The Working Group identified five priority theme areas where the province could focus its response:

1. Improving camp operations;
2. Increasing understanding and addressing information gaps;
3. Improving awareness;
4. Legislation, regulatory reform and policy tools; and
5. Supporting Indigenous women and children through community funding and social services.

This Discussion Paper provides a summary of the work to date. Concepts in the paper have been developed with input from representatives of Lake Babine Nation and Nak'azdli Whut'en, and was informed by targeted discussions with a number of Indigenous organizations, the federal government, local governments, service providers and industry. The engagement and research to support this paper focused on impacts to Indigenous women and children, predominantly in northern communities and is intended for internal to government review.

Improving the health and well-being of Indigenous women in contexts of rapid industrial development requires actions from organizations outside of the Provincial government (i.e., RCMP, Federal government, Indigenous governments, Indigenous organizations, etc.). The work that informed this Discussion Paper did not focus on actions by other groups, but acknowledges they are necessary partners for change.

Further engagement with Indigenous people and Indigenous women is needed to scope out possible actions for the Province to consider in better managing industrial camps, to support the development of a Provincial Action Plan. Further development of provincial actions will require endorsement by Provincial Deputy Ministers, significant resources and coordination across ministries and further engagement with Indigenous women, Indigenous governments and organizations, industry, external organizations, service providers and local government.

Acronym List

ALP – Aboriginal Liaison Program

B.C. – British Columbia

EA – Environmental Assessment

EAA – *Environmental Assessment Act*

EAO – B.C. Environmental Assessment Office

EMPR – B.C. Ministry of Energy, Mines and Petroleum Resources

ENV – B.C. Ministry of Environment

EVA BC – Ending Violence Association of BC

FLNR – B.C. Ministry of Forests, Lands and Natural Resource Operations and Rural Development

GBA+ - Gender Based Analysis Plus

IBA – Impact Benefit Agreement

ICR – Industrial Camps Regulation

IGBA - Indigenous Gender Based Analysis

KUG – Kemess Underground Mine

LNG – Liquefied Natural Gas

MACIW - Minister's Advisory Council on Indigenous Women

MIRR – B.C. Ministry of Indigenous Relations and Reconciliation

MOH – B.C. Ministry of Health

MOU - Memorandum of Understanding

NWAC – Native Women's Association of Canada

OGC – B.C. Oil and Gas Commission

OHSR - Occupational Health and Safety Regulation

TKN – Tse Keh Nay

TRC – Truth and Reconciliation Commission

STI – Sexually Transmitted Infection

UNDRIP - United Nations Declaration on the Rights of Indigenous Peoples

A. Introduction

Natural resource development is a major economic driver in B.C. that creates good jobs and supports the economy. There are a number of tools and mechanisms that the Province and industry use to assess, plan for and mitigate environmental impacts from natural resource development. However, the way that social and cultural impacts are planned for and mitigated could be improved. Social and cultural impacts are defined as changes to the way people live, work, recreate and/or organize to meet their needs (e.g. an influx of non-resident workers into communities could: put increased strain on limited recreational centres, or activities, such as hiking and mountain biking trails; lead to a higher cost of living for community members through increased costs of goods, services and housing; alter power dynamics or distribution, community attitudes and identity, and local government governance structures;)ⁱ. Social impacts can be directly attributable to a project or can be caused indirectly by a project's activities. Social impacts can be positive (desirable) or adverse (undesirable). Social impacts can be experienced by an individual, a family/household, a social/cultural group or community.

Natural resource development often requires the establishment of industrial work camps (see text box)ⁱⁱ. Industrial camps are established to support remote work sites, where highly mobile and temporary operations are required and when the workforce cannot be sourced locally. Camps are used to house workforces that support forestry activities, energy and petroleum resource extraction, infrastructure and hydro projects, mining and agriculture. Major projects often require industrial camps as important logistical support for both construction and ongoing operations. Housing workers in industrial campsⁱⁱⁱ can be a way to mitigate some of the social impacts of temporary workers on local communities, for example by preventing increased pressure on local rental markets, by providing in-camp amenities to camp residents, and by creating some physical distance between the camps and the communities.

Industrial Camps: are land or premises on which an employer, in connection with a logging, sawmill, mining, oil or gas operation, a railway construction project, a cannery, or a similar thing, owns, operates or maintains, or has established, permanent or temporary structures for use, with or without charge, by employees as living quarters. This could include accommodation or amenities that are constructed and managed by a third-party supplier where resource companies or “employers” rent out large blocks of rooms at these facilities for their employees who work in the area.

The Province and industry actively seek the support of proximate communities for major projects. The Province engages with affected communities to develop strategies to assess and mitigate impacts and enhance shared benefits, and consults with First Nations on decisions that may impact their constitutionally protected rights. Social impacts of industrial camps are inconsistently addressed in current processes. Generally, there is a limited awareness across the private and public sector of how impacts disproportionately affect Indigenous women and children. As a result, many positive initiatives and benefits that stem from resource development projects do not necessarily address or respond to the concerns of these populations. Municipal governments and Regional Districts have also raised concerns about the negative social impacts of industrial camps and the pressures camps can place on local community infrastructure and services.

When industrial camps are located near Indigenous communities, there is an opportunity for Indigenous communities and the surrounding populations to benefit from the industrial activity in the area. The Firelight Report identified several different types of benefits that communities associate with industrial camps including:

- Nation members returning back home to access new employment opportunities;
- Employment and acquisition of new skills;
- New contract opportunities for service operators and subcontractors;
- Increased revenue for businesses, e.g. community gas station;
- Indigenous representation in management of camps or projects can ensure they are planned and implemented with Nation's needs in mind;
- Collective investment in local infrastructure; and,
- Greater cultural understanding.

However, resource development projects can also have diverse impacts on Indigenous communities. Indigenous communities have raised concerns about the social impacts of industrial camps and the impacts camps have on Indigenous women and children.

Ensuring that natural resource development is supported by proximate Indigenous communities and that social, health, cultural, environmental and economic concerns are addressed is an important component of lasting reconciliation with Indigenous peoples. Efforts are required to both minimize potential impacts from industrial camps and maximize potential benefits to communities.

This discussion paper summarizes research and engagement on the potential impacts of industrial camps, and potential actions that the Province can take that are consistent with government's commitment to reconciliation and the implementation of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and the Truth and Reconciliation Commission's (TRC) Calls to Action. This includes developing mitigation strategies, plans and actions with deep and direct involvement of Indigenous peoples and that reflect the *Draft Principles that Guide the Province of British Columbia's Relationship with Indigenous Peoples*.

This paper summarizes issues related to the social impacts of industrial camps under five emergent themes:

1. Improving camp operations;
2. Increasing understanding and addressing information gaps;
3. Improving awareness;
4. Legislation, regulatory reform and policy tools; and,
5. Supporting Indigenous women and children through community funding and social services.

B. Background/Context

This section provides a background on how the Indigenous Communities and Industrial Camps project was developed, context on impacts of natural resource development on vulnerable populations and describes the project's scope.

B.1 Firelight, Lake Babine Nation and Nak'azdli Whut'en report

In 2016, MIRR and EMPR provided funding to Lake Babine Nation and Nak'azdli Whut'en who conducted research to examine the social impacts of industrial camps located near Indigenous communities and identify mitigation strategies. A final report, *Indigenous Communities and Industrial Camps: Promoting Healthy Communities in Settings of Industrial Change* (The Firelight Report), written with the Firelight Group, was primarily informed by a June 2016 workshop which included participation from: Indigenous community members and representatives; representatives from provincial and regional agencies in both social and natural resource sectors; industry; the Highway of Tears Initiative; and, Amnesty International. The report was also informed by interviews with community members, a literature review and dialogue with the provincial government.

The report was publicly released on February 9, 2017 at a meeting of the First Nations Summit. Specific recommended actions included the need for historic trauma training, a review of legislation, reporting and management practices for sexual assault, consideration of gender and community-based impacts in the environmental assessment (EA) process and increased resources for drug, alcohol and mental health

Community Response:

A number of activities were undertaken, including the hiring of Community Coordinators in Lake Babine Nation. Best Practices related to Community Coordinators included:

- Community activities should have leadership support;
- The work needs to start early, as it takes time to build relationships and develop long term trust and rapport in the community;
- Training to help Community Coordinators connect community members to information and resources, and how to provide trauma support to community members is needed; and,
- Other community training, such as violence prevention, elder abuse, anti-bullying and health forums, would also be valuable to both community members and service providers.

Creative initiatives were also undertaken by Nak'azdli Whut'en, who developed harm mitigation strategies for workers at the end of mine shifts. Best practices included:

- Providing supports to families while someone is away at camp;
- Providing supports, including greeters at the mine shuttle stops, for workers returning back to communities from camps; and,
- Taking a harm reduction approach to drug and alcohol use and addiction, violence and abuse.

counseling. Provincial Deputy Ministers created a cross ministry working group (the Working Group) to review the recommendations made in the Firelight Report and to advise and provide feedback on potential government actions.

Lake Babine Nation also received a provincial grant to support the development of a Lake Babine Nation and Nak'azdli Whut'en joint community response to the 2017 Report (see text box on previous page). This funding also supported the Lake Babine Nation and Nak'azdli Whut'en's participation on the Working Group.

B.2 Impacts of natural resource development on vulnerable groups

There is a growing body of evidence that suggests resource-based extractive industries can result in adverse social, economic, and cultural impacts, including impacts on the social determinants of health. These changes can in turn lead to cumulative impacts on the health and well-being of individuals and communities^{iv}. These impacts are complex and shape individual and community experience in diverse ways.

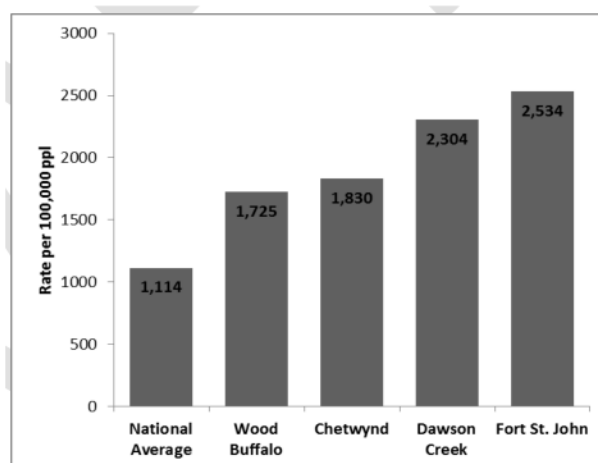
The benefits and costs of resource extraction are not equitably distributed among different segments of the population and disproportionately affect vulnerable groups including Indigenous women^v. Historic

Figure 1: 2015 Police reported Instances of Violence against Women

Note, police reported instances of violence against women are likely to under represent true rates of violence in communities

Source: Statistics Canada- Retrieved from Discourse Media

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and contemporary contexts, including years of colonial policies and practices has created a legacy of social problems that contribute to the challenges faced by vulnerable populations in Indigenous communities. Figure 1 illustrates how women face higher rates of violence in resource extraction communities than the national average^{vi}.

The legacy of residential schools and the imposition of colonial and patriarchal modes of governance and family-making (i.e., how family systems are defined) have led to the suppression of Indigenous culture and Indigenous modes of governance^{vii}. The emotional, physical and sexual abuses that both boys and girls experienced in residential schools have led to trauma being passed on from generation to generation. As a result of this history, Indigenous men, women and children continue to experience systematic discrimination, prejudices and are disproportionately being affected by violence, poverty, and illness^{viii}.

While all portions of Indigenous communities continue to struggle from the effects of colonization, women within Indigenous communities continue to experience disproportionately high levels of violence. For example, while Indigenous women make up only 5 per cent of the female population in Canada, they accounted for 24 per cent of all victims of homicide in 2015^{ix}. Furthermore, Indigenous women are three times more likely to be victims of violence than non-Indigenous women, and those violent situations are eight times more likely to end in homicide^x.

Amnesty International (*Out of Sight, Out of Mind*) and the Firelight Group with Lake Babine Nation and Nak'azdli Whut'en (*Indigenous Communities and Industrial Camps*) have applied a gendered lens to demonstrate the ways resource development can negatively affect Indigenous women and children. These include:

- Increased sexualized violence, domestic violence, sexual harassment, rape, and assault;
- Increased problematic substance use;
- Increased demand for sex work and higher risks of sexual exploitation;
- Increased economic inequality (high wages of workers vs. low wages of Indigenous women);
- Increased costs of living, and food and housing insecurity; and,
- Decreased ability to connect with Indigenous governance and health/wellness practices such as hunting, fishing, berry picking, etc.

These reports conclude that the use of mobile workforces that are disconnected from the region can reinforce and recreate historical patterns of violence against Indigenous women. Industrial camps must be managed and operated in a manner that protects and promotes the health of the employees at the camps and prevents potential negative impacts on nearby communities – especially vulnerable populations.

B.3 Project Scope and Working Group

The Working Group is led by co-chairs from EMPR and MIRR, with the support of two staff (the Project Team). Membership of the Working Group includes representatives from provincial government ministries, a regional health authority, the Minister's Advisory Council on Indigenous Women (MACIW) and Indigenous representatives from the Lake Babine Nation and Nak'azdli Whut'en (see [Appendix 1](#) for membership).

The Working Group was asked to review the Firelight Report recommendations and identify potential government actions. The Working Group had the following objectives:

- Review the Firelight Report recommendations and identify potential government actions;
- Work closely with Indigenous partners to ensure the process, issues and proposed solutions reflect Indigenous perspectives;
- Conduct a gap analysis to determine linkages to existing programs (provincial, federal, and industry) and identify possible gaps and areas for action;

- Provide input to inform the development of a Provincial Action Plan; and
- Identify appropriate stakeholders and industry groups (oil and gas, mining, forestry and local government) to engage and to explore roles and responsibilities.

The Project Team, with support of the Working Group, had targeted scoping conversations from June 2017 to January 2018 with stakeholders and organizations with experience and interest in the issue. An iterative approach was taken, with Working Group members suggesting initial stakeholders and organizations and those individuals suggesting subsequent contacts.

Targeted scoping conversations sought to apply an inclusive Indigenous and gendered lens with focused representation from diverse Indigenous communities and organizations (i.e. Indigenous governments, Métis, on-reserve, off-reserve) and women's organizations. This initial engagement helped to: improve the Province's understanding of existing work and the issue, identify the scope of potential actions and solutions and possible opportunities to collaborate and leverage existing programs. This approach helped to identify priority groups that should be engaged with over the long term for the development of initiatives, programs and potential legislative and regulatory changes.

The Working Group's original mandate focused on understanding concerns and proposing solutions related to the construction and operation of LNG pipelines. However, a broad range of issues emerged around the impacts of all industrial camps. The range of issues is broader than any single industrial sector, takes into consideration the complex historic and contemporary factors that contribute to the vulnerable status of Indigenous women and children and requires an acknowledgment of the complexity of the interrelated factors and drivers. As a result, the scope of the project has expanded to include the impacts of all industrial camps province-wide (i.e., camps associated with forestry, infrastructure and power projects, mining, and other oil and gas developments). The Project Team took an inclusive approach aligned with the principles in UNDRIP and considered impacts and solutions applicable to all Indigenous peoples with a focus to Indigenous women and children living in northern B.C.

While the mandated scope of this project has focused and continues to be primarily on Indigenous women and children, it is recognized that natural resource development can also disproportionately and adversely impact elders, Indigenous men, gender-diverse and two-spirited people and other vulnerable groups. Engagement has also highlighted that initiatives aimed to improve the well-being and safety of Indigenous women and children require men to be part of the solution and should take a holistic and inclusive approach to community development.

Many of the learnings and leading practices identified through research and engagement have the potential to support other vulnerable populations, the well-being of camp residents and Indigenous and non-Indigenous communities impacted by industrial camps as a whole. Given the complex interplays between Indigenous and non-Indigenous communities, on and off reserve populations, social service delivery and social issues in general, the benefits that would be achieved by the recommendations provided in this Discussion Paper have the potential to improve broader overall social and health outcomes.

Many of the issues raised related to improving planning, communication and relationship building are also applicable to non-Indigenous communities. As the focus of this Discussion Paper is Indigenous women and children, and more broadly Indigenous communities, further work is required to determine if recommendations should be broadened to include other non-Indigenous communities.

C. Discussion: What We Heard

This section of the Discussion Paper provides a summary of what was heard from the Working Group, what was heard from targeted scoping conversations and from what was found in relevant research.

Based on this work, the Working Group identified five emergent themes of action:

1. Improving camp operations;
2. Increasing understanding and addressing information gaps;
3. Improving awareness;
4. Legislation, regulatory reform and policy tools; and,
5. Supporting Indigenous women and children through community funding and social services.

C.1 Improving camp operations

Impacts that an industrial camp can have on local communities and Indigenous women and children are influenced by:

- Location;
- Camp culture;
- Communication and community relationships;
- Camp amenities and services;
- Workforce demographics; and,
- Camp policies.

These factors influence worker behaviours off-site and outside of work hours (e.g., when workers are transiting through communities or visiting regional hubs on days off. Worker behaviour outside of the workplace is generally not regulated (see section C4. Legislation, regulatory reform and policy tools), and is complicated to manage and mitigate, but was an issue that was raised throughout the research and engagement process.

C.1.1 Location

Siting of industrial camps has important social implications for camp residents, workers' families and for proximate communities. Siting decisions are typically based on the physical and geographic features of the area, access to infrastructure and maximizing economic benefits from the influx of workers in communities. First Nations have the opportunity to notify agencies (i.e., the B.C. Oil and Gas

Commission (OGC) in the case of oil and gas development) of any concerns regarding camp location. However, in many cases concerns about the social impacts from locating camps near Indigenous communities are not raised or there is limited opportunity for them to be raised in the case of smaller projects

Being located in remote areas can also influence camp culture. Remote, isolated camps that lack positive social outlets can have negative impacts on the mental health and well-being of camp residents. As a result, as a means to relieve the stress associated with camp life, camp residents returning home or transiting through local communities may respond and behave in ways that negatively impact communities.

A report by the University of Northern British Columbia (2015) suggests increasing camp resident access to local communities can foster improved connections and communications, reduce stigma, enable more positive family dynamics for the camp workforce and enhance economic development opportunities for the community^{xi}. However, not all Working Group members, stakeholders, external organizations and Indigenous representatives and organizations were supportive of increased access. Because there is limited corporate responsibility or regulatory oversight of workers off site, some individuals expressed that access to proximate communities by camp residents should be limited as a strategy to mitigate risk. This illustrates that the siting of work camps is very much situation and community dependent, underlying the importance of engaging early with nearby communities to understand local perspectives, concerns and opportunities before a siting decision is made. Indigenous communities have varying perspectives, and there may be an opportunity to promote peer-to-peer learning between communities already impacted by resource development and those being consulted on proximate future projects.

Industrial camps can have other, indirect impacts on Indigenous communities. For instance, camps can increase camp residents' access to the backcountry resulting in increased hunting and other activities. This activity can have a negative impact on traditional harvesting areas, cultural and other sacred sites. Since Indigenous communities' spiritual, cultural, and social practices are tied to the land base, the presence of an industrial camp can disrupt their ways of life and can have negative impacts on overall health and well-being. In addition, the presence of workers can increase demand, and the cost, for basic necessities in remote communities. Siting decisions, camp locations and policies dictating camp residents' access to proximate communities can help to mitigate some of these impacts.

Factors that industry, with the support of governments and local communities, could use to help address impacts associated with camp siting and location include:

- Including social impact assessments in the planning process for camp siting, design and operations;
- Involving Indigenous governments, non-Indigenous communities and service providers in preliminary discussions and decisions of camp location;^{xii} and,
- Implementing a flexible approach to addressing community concerns throughout the lifecycle of the camp (planning, operations, and post-operations).

C.1.2 Camp culture

Industrial work camps often house male-dominated workforces. The culture of industrial work camps has been described as a hyper-masculine work environment, where sexist, racist and homophobic views are expressed. Although these views may be prevalent elsewhere in society, the nature of camp work, including long stressful hours and time away from families, communities and social norms can create a culture that lacks self-care and collective accountability. This can affect worker behaviour in and outside of camp, and create a culture where sexist, racist and homophobic views go unchallenged. This environment can often feel unsafe or undesirable for women and Indigenous people.

Long work hours, long stretches of work days without days off and the lack of importance put on self-care, also mean camp residents often seek opportunities to release stress at the end of their work rotation. This culture of “blowing-off steam” can lead to significant increases in alcohol and drug consumption and demands for sex work, which are often sought from the surrounding communities or regional centres and transit hubs. In addition, camp culture and operations often lack a focus on well-being; workers with existing or emergent mental health issues may be underserved at the camp and present a pressure on medical services in nearby communities.

Camp culture can result in a number of negative social impacts. These include:

- Increased demands for sex work, which disproportionately affects Indigenous women;
- Risky and inappropriate behaviour;
- Increased substance use (in particular during off-work hours) which leads to increased availability and demand for illicit substances in rural areas; and,
- Decreased volunteerism and social cohesion in host communities where local residents are required to live in camps while working on projects.

The factors contributing to the culture of work camps are not limited to inside the camp itself. Indigenous female respondents to a study conducted by Status of Women Canada identified specific periods of increased violence and abuse against Indigenous women and girls, citing “work holidays or breaks” when transient workers traveled into neighboring towns to “blow off steam and binge drink” and “pay days” when transient workers had cash to spend on alcohol and sex workers^{xiii}. Conversations with the RCMP highlighted increases in crime rates when temporary workers are on break.

Locating camps near Indigenous communities provides an opportunity for cultural learning and reconciliation to occur but must be supported through cultural safety and historical trauma training and proactively developing trusting relationships. This could involve:

- Indigenous communities developing Cultural Competency Handbooks that outline advice and expectations for industries operating near communities;
- Cultural orientation for camp operators to build cultural competencies, including tolerance and respect;

- Training camp managers and employees on historic trauma, colonization and cultural safety (i.e., cultural training to better understand values of Indigenous workers and the ways that camp culture, worker accommodation and shift arrangements might impact these values);
- Providing orientation, education and supports for camp residents in industrial camps which could include:
 - Reporting or speaking up against poor behaviour in camps;
 - Identifying and responding to signs of domestic violence;
 - Addressing and preventing substance use, addictive disease and associated harms;
 - Creating opportunities for intervention and prevention to break cycles of violent behaviour;
 - Identifying and responding to signs of sex trafficking;
 - Identifying and addressing sexual harassment and assault; and,
 - Creating cultural opportunities to build relationships with communities.

C.1.3 Communication and community relationships

The level of communication between proximate communities and industrial camps varies. Municipal governments and Indigenous representatives have both indicated that they are not always informed of the presence of proposed or existing industrial camps. Some camps have limited communication with proximate communities, may not have agreed upon communication protocols, camp policies, and are not required to set up mechanisms to address grievances. Furthermore, when communication and continuous improvement processes (sometimes called grievance processes) are in place through proponents, they may not apply to contractors and other businesses that provide services to the industrial camp or the project.

Initiatives that may help foster good communication between work camps and local communities include:

- Establishing agreed upon communication protocols. Communication protocols between the camp operators and communities should be set out during work camp planning;
- An industry-established process for communities and individuals to bring concerns forward to the operators, sub-contractors and owner of the major project for investigation and follow-up. This should include a grievance and/or continuous improvement process for communities to notify operators of any concerns or incidents. A continuous improvement process could include community advisory panels that provide a forum for community members to identify economic and social issues to operators and that would result in continuous improvement to policies, services or operations;
- Creating and funding social liaison programs in communities to monitor and report issues related to camps to Indigenous government offices (e.g., develop socially focused Aboriginal Liaison Program) and appropriate government agencies; and,
- Funding holistic wellness and safety plans for communities (and potentially for the camps themselves).

Although not the focus of discussions for this project, Working Group members noted that projects can have positive impacts on local communities including: enhanced economic benefits; employment opportunities; and, access to and use of improved infrastructure, services and amenities. Projects often have stringent compliance and enforcement of environmental and safety standards which can contribute to more positive relationships with communities (See best practice text boxes below).

Best Practices: Tahltan Socio-Cultural Working Group

Indigenous communities are seeking to strengthen their capacity to share in British Columbia's economic prosperity. The Tahltan Socio-Cultural Working Group was set up to manage the socio-cultural impacts of the Northwest Transmission Line on Tahltan people.

The Socio-Cultural Working Group (SCWG) approach sets the conditions for innovative systemic change to strengthen First Nation/Indigenous Community strategic and institutional capacity to promote community wellbeing and incrementally improve socio-cultural and economic outcomes for the First Nation/Indigenous Community, its families and citizens. This adaptive framework allows for development and evaluation of work plans on a rolling basis and has expanded to include social and cultural impacts of the Red Chris and Brucejack Mine Projects.

The Tahltan SCWG is developing cultural competency handbooks that will be a guide for employers in the territory. The handbook shows how employers can enhance the opportunities for Tahltan members, so they feel valued at workplaces and will help employers promote and respect the people on whose lands they earn their income.

Best Practices: Collaboration Tables for Major Projects – Kemess Underground Mine

Some First Nations have expressed concerns about the EA process, citing their limited capacity to engage in a technical and time intensive review, the focus on western science, and the lack of decision making authority for First Nations. By changing how the Province works with First Nations on EA reviews, risks of legal challenges are reduced, a more positive investment climate is created, and the Province's goal for reconciliation with Indigenous peoples is supported. One example of this is the collaborative approach that the Province took with Tse Keh Nay (TKN) in the EA process for the Kemess Underground Mine (KUG).

A significant shift in the BC Environmental Assessment Office's (EAO) process was defining the government to government relationship with TKN and reaching agreement on the shared responsibilities of the EAO and TKN, as set out in the Collaboration Plan. Through this Plan, the EAO established co-administration of the EA process and a path for seeking consensus on decisions in the EA. A unique approach to the EAO's assessment was taken, whereby TKN drafted key elements of the EA decision materials related to impacts of KUG on TKN's Aboriginal Interests, a role normally undertaken by the EAO. This ensured that TKN had a voice in the EAO's assessment. During the EA process, TKN raised concerns that were not project-specific and could not be addressed through the EA or subsequent permitting, but were vital to the TKN being able to support further development within their traditional territories.

The Province was responsive to those non-EA interests and created a venue for broader issues (a government to government table), aligning their timeframes with the EA in a way that allowed TKN to have confidence in those issues being addressed. Notably, during the EA process, EMPR and EAO were willing to discuss how issues of concern would be addressed in their subsequent permitting process and began development of a permitting collaboration plan with TKN, modelled on the EAO's collaboration plan. The existing collaborative relationship between TKN and AuRico was key to the success of this approach, providing a good foundation for the EAO and TKN to implement new and creative approaches within this EA.

This new approach resulted in a timely and durable regulatory decision, built trust and confidence for investors and industry, advanced the credibility of the regulatory regime, fostered a more seamless permitting process and demonstrated how B.C. is implementing reconciliation with Indigenous peoples.

C.1.4 Camp amenities and services

The amenities provided at camps are generally driven by a need to attract and retain qualified workers and keep workers in camp. Amenities can include the services that are available to camp residents on-site (i.e., health and medical services) as well as social and entertainment services provided by the operator. All of these amenities can shape worker behaviour off-site and outside of work hours. Non-health and medical amenities that could help limit social, service and infrastructure impacts on neighbouring communities include:

- Regulated wet lounges. Lounges can limit drinking in towns and reduce binge behaviours;
- Wi-Fi and communications technology. The ability to communicate can enable camp residents to remain connected with their home community;
- Recreation facilities. Recreation facilities provide positive social outlets and can function as shared infrastructure and resources for proximate communities.

In addition to camp amenities, services and programs offered on-site can help camp residents to build resistance to work related stress, mitigate effects associated with the camp environment and support mental health and well-being. Camp operators are required to meet WorkSafeBC legislation through on-site health and safety programs. However, these programs do not address risky behaviours outside of the workplace or necessarily translate into amenities to improve overall well-being (see section [C4](#)).

If a project triggers an EA and is awarded an EA certificate, the Environmental Assessment Office (EAO) can require certificate holders to provide certain services and amenities. The EAO often works with health authorities (i.e., Northern Health) to determine the appropriate level of services. In this context, there is an opportunity for community representatives, EA Working Group members, industry or regulators to identify camp amenities that would serve to mitigate potential project impacts. An example of this would be major projects with large camps in the Northern Health region which contain conditions for the inclusion of health service mitigation strategies, such as on-site clinics. For projects outside of the EA process, industry and operators determine the level of services and amenities they are willing to provide at industrial camps (see section [C4](#)).

Camp, services and programs that foster wellness and social connectedness and prevent problematic substance use and associated harms (such as on-site sexual health counselling and education, sexually transmitted infection (STI) testing and/or linkages to these services) can prevent and mitigate impacts to workers, their families and proximate communities and include:

- Employee and Family Assistance Programs. While many companies have access to Employee and Family Assistance Programs, awareness of the programs could be increased as a tool to support workers;
- On-site medical facilities. Camp residents may experience disruption in their access to health services when living in camps and may need to access health services in proximate communities. On-site medical facilities provide continued access to health services for camp residents without impacting proximate community services. On-site health care can also help minimize other

impacts to communities (e.g. by offering sexual health supports, assistance for workers experiencing mental health issues and/or substance use disorders, etc.); and,

- Social programming and activities. These on-site programs should be provided as a positive means of stress relief and to mitigate the psychosocial effects of the camp environment (i.e. a well-equipped gym, sports, bowling, trivia nights, game nights, or hobbies).

C.1.5 Workforce demographics

Industrial camps are often male-dominated. As outlined in section C.1.2, the transient nature of work camps can create a culture of limited individual and collective accountability. There are fewer self-regulating social norms dictating camp behaviours and a culture that can reinforce a lack of self-care. Evidence suggests that the presence of women improves the culture of male-dominated industries. A promising tactic is to create strategies to accommodate and retain women in male-dominated industries. However, work practices and policies make recruitment of women difficult. Limited retention and recruitment strategies for women (duration of shifts, access to childcare, resources and safety supports etc.) contribute to male-dominated camp settings. Supports need to be in place to make industrial camps safe and inviting environments for women.

Improving employment conditions to make industrial work more attractive to female workers could help to address this issue. This could include:

- Introducing shorter shifts to accommodate childcare needs;
- Specific training programs for women;
- Developing strategies to assist male workers to address cultural changes and being more inclusive of women;
- Providing day care services;
- Providing suitable and safe accommodation and bathrooms for women;
- Providing site security; and,
- Equitable hiring practices and anti-harassment policies.

C.1.6 Camp policies

Camps generally have policies that dictate expected behaviour for workers. These policies are developed to address the health, safety and efficient operation of the project for which workers are employed. However, policies do not necessarily consider or reflect the concerns of proximate communities and vulnerable populations.

Companies can demonstrate their expectations about camp culture by setting out expectations through worker codes of conduct that would apply on and off worksites and camps and inside and outside of work hours. A worker code of conduct that applies outside of work hours and outside of work and camp locations could be a mechanism to ensure behaviour in the community is aligned with employer expectations. A worker code of conduct could include social contracts as a condition to residency where

breaches can result in dismissal from employment, or mandatory training and rehabilitation programs. These contracts could set out standards for behaviour and consequences for action set out by a community advisory group. For government contracted camps, a worker code of conduct could be required as part of contract procurement. This requirement could have long term positive effects, for example, in temporary emergency camps, but typically the same contractor is procured every year.

Social Codes of Conduct: The Town of Labrador City has insisted that all workers in camp accommodation sign social contracts as a condition to residency where breaches can result in dismissal from employment. These contracts set out standards for behaviour and consequences for action set out by a community advisory group and are seen to have made a positive difference in worker's behavior (House of Representatives, 2013).

Camp policies have the potential for having large impacts to camp worker behaviour. For instance, providing camp workers a snack on their way home from camp has been shown to reduce incidence of domestic violence over time. Working with researchers, like the B.C. Public Service Agency's Behavioural Insights Group, camp contractors and communities, could help to identify and test changes to camp policies to limit impacts on proximate communities. These tested operational changes could inform the development of best practices.

Other policies could be developed and/or amended to outline clear expectations for camp residents on issues such as:

- Access to vehicles and transit between proximate towns and the industrial camp;
- Alcohol and other drug use;
- Housing requirements (e.g., camp guests, tenancy requirements);^{xiv} and,
- Firearm use and hunting.

Policies that limit worker access to communities are strategies that have been used to mitigate risk when there is little corporate oversight on worker behaviour off-hours and off-site. However, completely cutting off a camp from the community can limit economic benefits for local businesses, increase the social isolation of workers and limit workers' access to social supports. Segregation also does not address institutional racism and does not contribute to improving cultural awareness.

Initiatives that may help address the social impacts of worker behaviours on Indigenous communities include:

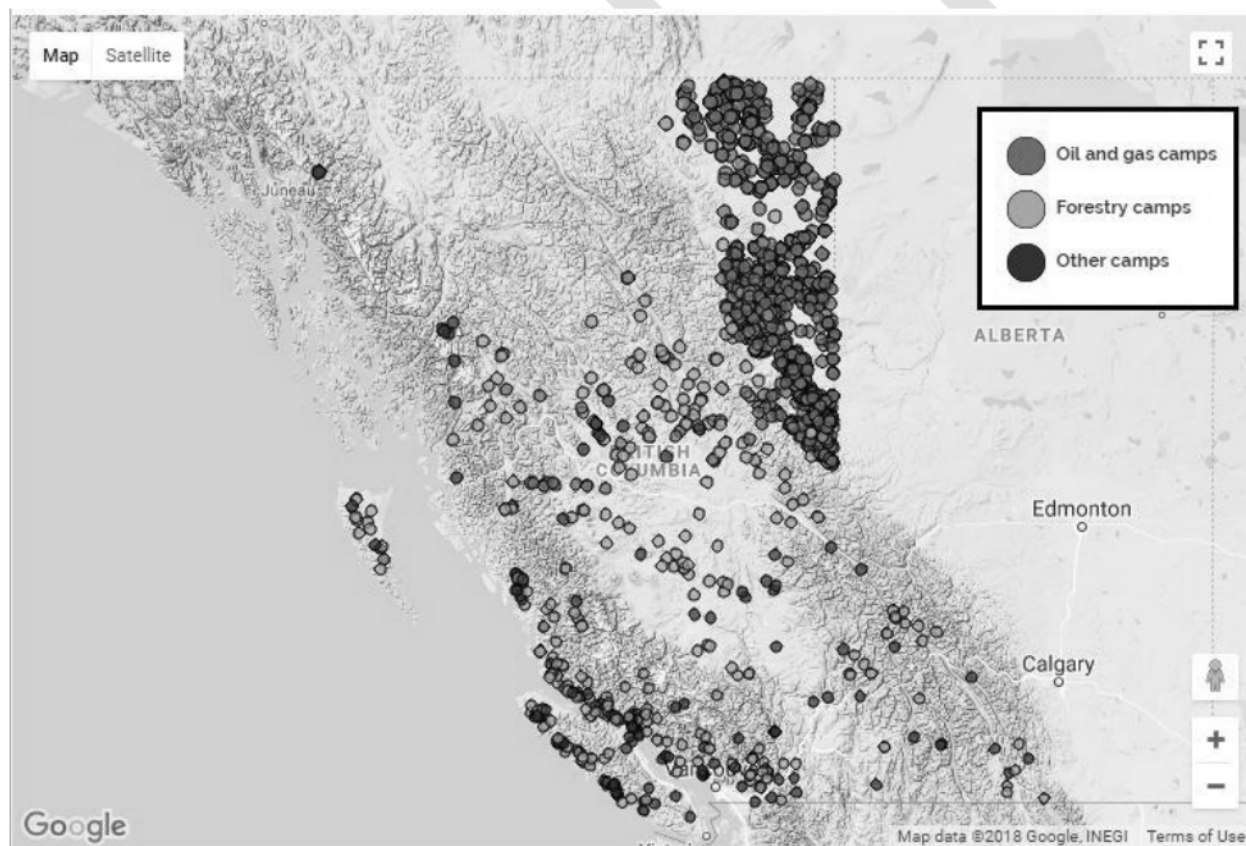
- Creating mechanisms for communities to provide input and influence camp policies;
- Engaging early with communities on the design of camp policies; and,
- Creating mechanisms to revise camp policies in response to emerging concerns from the community.

C.2 Increasing understanding and addressing information gaps

C.2.1 Number and location of industrial camps

There is no single agency responsible for tracking and documenting industrial camps in B.C. Data is inconsistently collected across sectors, not centralized and can be challenging to track down. As a result, the Working Group was unable to obtain accurate and timely estimates of the total number of camps in operation, locations, number of occupants, whether they are active or their duration of use. A number of organizations have tried to estimate the number of industrial camps in B.C. with estimates varying widely. In 2012, Northern Health estimated there were 1800 camps related to forestry, mining, oil and gas and hydroelectric activities in the Northern Health region.^{xv}

Figure 2: Map of industrial camps in B.C. (Fionda, F. & Jones, E.)



Building off this methodology, Discourse Media (2018) estimated that there were 2000 camps in all of B.C., although they were unable to determine which of these were active (Figure 2)^{xvi}.

Data available on industrial camps depends on the types of authorizations associated with each camp. For example, on Crown land, operators apply for permits to use land for the purposes of a camp, while additional authorizations may involve food service, drinking water, sewage disposal and building plans.

Recent information on sewage and waste disposal permits from Northern Health shows there are 105 active and 6 pending camps with permits in the north, serving up to 9,585 workers, representing about 3% of the permanent population in the same area. This does not include permits for larger industrial camps that would require a permit under the *Environmental Management Act*. This figure differs from the estimated 293 camps that have been issued water permits.^{xvii} The lack of consistent data and ability for agencies to merge and compare data sets on industrial camps underscores the challenges in identifying the scale of activity and developing appropriate mitigation measures.

Workers can also be housed in hotels, lodges, motels, or other temporary accommodations that are not classified as traditional “industrial camps”^{xviii}. This transient, shadow population is even more difficult to estimate and may have the same or larger impacts on communities due to a lack of industry and corporate oversight and policies to dictate behaviour. These workers are likely to use the amenities and services located in proximate communities and may be driving many of the concerns raised during engagement with service providers.

Developing appropriate actions to assess, plan for and mitigate the potential social impacts of camps and transient workforces requires accurate information, notification and monitoring. It was suggested that government needs to develop a centralized database and notification system to collect, track and share information related to camps and non-resident workforces. In particular, there is limited ability to share and coordinate information on natural resource decisions with the social sector for non-EA reviewable projects. Without additional information (e.g., on the total number of non-resident workers) there is limited ability to understand the cumulative impacts on social indicators, to consider indirect impacts or to conduct regional land use and community planning that responds to the realities of having large proximate camp populations. However, any efforts to coordinate data collection across sectors and notification of camps across the province will require a deeper examination of the ways that camps are currently regulated and permitted.

C.2.2 Social impact monitoring and baseline data

The social impacts of resource development are complex and result in different experiences for different individuals and communities. Standard research approaches may not capture and reflect the range of communities’ experiences. Other approaches may be more appropriate, such as community-based participatory research which is not widely used in policies and decisions related to natural resource projects. Quantitative data has considerable limitations when considering local experiences, yet is often considered superior to qualitative data. Small population numbers make tracking social indicators challenging, particularly with regard to sensitive or confidential health or income information. Social indicators are generally collected and developed externally, without recognizing the right of Indigenous governments to define community wellness, identify relevant indicators and collect, own and manage data.

Access to timely information on social, economic, cultural, natural resource and environmental data is a key component of planning, governance and developing and tracking responses to concerns. The lack of camp data and data on the attributes that contribute to or mitigate their social impacts makes it difficult to determine the impact and identify best practices^{xix}. For example, not having data on how access to services affects worker behaviour makes it difficult to know what services are needed.

The EA process only considers significant adverse impacts on reviewable projects. This leaves limited mechanisms to address the social impacts of camps outside of the EA process, the cumulative impacts of multiple camps, indirect impacts of camp populations or more general impacts of transient workers and boom-bust cycles of resource development (including consideration of broader historical and socio-cultural contexts and vulnerabilities).

While the EAO is currently working to improve the way that social impacts are considered in the EA process, there is a general lack of baseline data on social indicators in communities across the Province. Although a set of social determinants of health have been developed by the Office of the Provincial Health Officer, it has been proposed that greater understanding and evaluation of the social impacts of camps should be developed to ensure that impacts experienced from camps can inform other areas of social policy and programming^{xx}. Social indicators could be developed that reflect community values and could be used to estimate potential social and health outcomes from proposed camps, as well as to inform broader social policy and resourcing decisions. Baseline information and evaluations of a diverse cross section of camps in partnership with communities would be required as without this information, it is not possible to distinguish to what extent social impacts are driven by industrial camps, transient workers or other factors.

Further engagement with Indigenous women, Indigenous leaders, industry associations, industry, contractors, service operators and camp workers is important to deepening understanding of the impacts of industrial camps. While engaging with all these groups is recommended, in particular the Working Group heard suggestions to:

- Engage with Indigenous women. Engagement with the population most impacted is vital to better understanding the impacts of industrial camps. The MACIW could offer advice on how to facilitate focus groups, one-on-one sessions, or other culturally appropriate engagement strategies that are flexible to the needs of individual communities;
- Engage with Indigenous leaders. Engagement with Indigenous leaders is vital to gaining a better understanding of the full range of both positive and negative impacts from industrial camps. This should include a discussion about addressing the social impacts of industrial camps in benefit negotiations; and,
- Hold focus groups with camp workers, their families and camp operators. Industry has a positive perception about changes in camp culture and camp impacts that is at odds with what the Working Group found through discussions with social service providers and other research. Engaging directly with camp workers and operators would inform the understanding of camp culture itself and contribute to actions that will be more successful. Information from focus groups could be used to engage further with unions, worker and industry associations.

C.2.3 Information sharing

There is limited capacity to share information on social data and coordinate responses across provincial ministries and agencies. Information on social indicators is not centralized and is not linked to information on natural resource decisions or extraction or shared with natural resource ministries. Limited information sharing between these sectors makes proactive planning (including in community and economic development and land use) and responses challenging. There is also limited information sharing on mitigation strategies for social impacts with communities or decision makers in the project proposal phase of the EA process.

The lack of information sharing can create inefficiencies in permitting and compliance and enforcement for camps in some sectors. The B.C. Chamber of Commerce (2014) identified up to 11 different onsite inspections required after a camp is permitted.^{xxi} This can lead to limited coordinated oversight in inspections, a challenge articulating in particular for inspections related to health and safety where capacity to travel to remote locations is limited. Information is not necessarily shared between these various agencies. There is an opportunity to improve information sharing between ministries and other authorities (i.e., WorkSafeBC and Northern Health) by reporting any permitting authorizations and other information about existing or proposed camps.

At the same time, there is a perception that Indigenous communities, service providers, planners and other orders of government are not informed of planned or operating camps in their areas of jurisdiction, in particular for regions with many small operating camps. This limits the ability to proactively plan for the presence of industrial camps and transient worker populations associated with many projects across different sectors.

A regional social impacts risk register could be developed to link camp data (when collected) to existing assets in the region. The potential impacts of heavy industrial activity, multiple industrial activities or several camps in one area could be assessed in relation to existing assets, infrastructure and services. Using this method, “red zones,” where there are high potential impacts from industry, could be identified and could inform community and regional planning.

C.3 Improving awareness

Decision makers, service providers, public servants, industry workers, industry executives and social impact assessors may not understand: the historic and cultural factors that have shaped Indigenous communities (including the ways that social issues have emerged from colonial policies and practices); Indigenous worldviews; or a community’s vision for the future.

The TRC Call to Action 57 calls upon all orders of government to provide education and training to public servants on “the history and legacy of residential schools, UNDRIP, Treaties and Aboriginal rights, Indigenous law, and Aboriginal-Crown relations.” The Call to Action highlights the need for “skills-based training in intercultural competency, conflict resolution, human rights, and anti-racism”^{xxii}. These

approaches are equally relevant and necessary for industry executives, management and workers, and are echoed in Call to Action 92 aimed at the corporate sector.

The contemporary and historic realities of Indigenous peoples have resulted in individuals and communities experiencing cumulative trauma from daily stressors of violence, concentrated poverty and historic and structural racism and disenfranchisement.^{xxiii} Frameworks and policies that include a cultural component and trauma-informed approach grounded in an understanding of Indigenous worldviews and experiences can improve and support community well-being. Trauma-informed approaches are needed for service delivery, training and Indigenous supports and should apply to policy design, community building and engagement processes. Indigenous Gender Based Analysis (see textbox on next page) is one approach that could integrate these considerations into public or private sector decision making processes.

Generally, raising awareness and sharing information has been highlighted as an important tool to ensure existing initiatives better support the needs of Indigenous women and children. It is important that Western and patriarchal governance models do not further or continue to marginalize Indigenous women. Currently, there are visible and invisible barriers to Indigenous women participating in and expressing concerns related to resource development on their territories.

C.3.1 Public Sector

The social impacts of industrial camps experienced by Indigenous communities are affected by broader government policies and decision-making. The Government of B.C. must consult with Indigenous peoples on decisions and actions that could potentially affect their rights. As part of this process, the Province seeks to engage with Indigenous communities and ensure that they share the benefits of projects. Government-First Nation benefits agreements tend to focus on accommodating impacts to rights and title through revenue sharing, land provision, economic development and employment opportunities. Some benefits agreements allocate a portion of funding to address social issues at a high level such as housing, health care, and child and family services. However, agreements generally do not focus on broader social determinants of health, community well-being and anti-violence measures, or on impacts and benefits of projects on Indigenous women and children. These agreements take years to negotiate and implement and may not address preventative issues related to short term camps. Agreements do not consistently identify social issues so there is not a consistent stream of funding for social issues arising from resource development impacts.

There is room to improve the way gendered, health and social impacts (increased risks of violence, sexual exploitation and demands for sex work, increased prevalence of STIs and communicable diseases, or differential wage, employment and affordability impacts) are addressed in EA processes, s.13

s.13

Gender Based Analysis is an analytical tool that uses gender (social identity) as an organizing category and addresses the differences between women and men in a social context.

GBA+ acknowledges that GBA goes beyond sex and gender differences and considers how other factors like race and class, intersect and influence peoples' experiences in complex ways.

IGBA and an Indigenous lens to GBA+ has emerged s.13 to

assess and mitigate social and environmental costs of projects and increase the benefits of development for vulnerable groups. s.13

s.13

Indigenous Gender Based Analysis (IGBA) is an emerging approach. It begins from the position that colonization has – through a number of approaches and processes, including the forced implementation of patriarchal, Western versions of governance and family-making – contributed to the historic and contemporary marginalization of Indigenous women and gender-diverse people by creating patterns of violence and devaluation that continue today.

s.13

The concept of

IGBA aims to help better acknowledge and understand the historic and contemporary discrimination experienced by Indigenous women and gender-diverse people and engage them in processes that affect their life opportunities.

s.13

s.13

reaching to all budgeting, policy, and programming

processes across government for the implementation of GBA+. s.13

s.13

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C.3.2 Corporate Sector

The Working Group heard a wide range of input from industry, contractors, service providers and communities. Contrasting narratives emerged about how camps are run and their impact on communities. It was noted that rising commodity prices prior to 2014 created increased competition for skilled labour and that, as a result, a number of initiatives were undertaken to improve the living conditions of workers, with a focus on safety and performance. Consequently, industry contends that camps are addressing the hyper-masculine culture and have become healthier places to work.

However, service providers confirm that many of the same social issues are still present (higher demand for sex work, human trafficking between camps, racism towards Indigenous workers, and increased instances of women and children fleeing violence). There is a need for more detailed and industry specific information about these issues, appropriate processes and mechanisms for response, and effective mitigation strategies.

Many companies, in particular for large projects, actively seek to minimize and mitigate negative impacts and to create, maximize and enhance the socio-economic benefits of project development as a means to gain social license and positive support for projects^{xxv}. Some companies go beyond the Crown's consultation requirements and pursue innovative and collaborative partnerships with Indigenous governments to improve a project's economic outcomes and share project benefits.

Although these initiatives provide important mechanisms to address the social impacts of projects, they do not necessarily apply an Indigenous and/or gender lens. Industry-led initiatives are not necessarily responsive to the needs of the most vulnerable in communities and are not substitutes for social services.

s.13

- Encouraging the application of IGBA lens to Impact Benefit Agreements in order to consider the range of gender and social impacts a camp might have on a community;
- Providing IGBA education and awareness training to industry associations, companies, contractors and service providers;
- Developing Social Impact Assessor professional qualifications, competencies and/or standards that include IGBA training and expertise; and,
- Developing corporate responsibility best practices. Smaller companies or camp contractors may not have the capacity to develop their own policies regarding corporate responsibility and may rely on standards and policies set by leaders in the industry. Government could partner with industry to develop best practices and corporate responsibility agreements encouraging the companies to follow the principles of IGBA.

Industry has an interest in attracting quality employees and the support of local communities that neighbour their operations. Working together to improve how industrial work camps are managed and operated will reduce the negative social outcomes being experienced by Indigenous women and children and provide improved working conditions to attract and retain a qualified workforce.

C.4 Legislation, regulatory reform and policy tools

C.4.1 Current regulatory environment

Industrial camps operate under a patchwork of regulations; with no single authorizing body (see [Appendix 2](#)). There is no single legislative or regulatory authority that is responsible for addressing the spectrum of social impacts of industrial camps on host or proximate communities (Table 1).

The EAA requires the consideration of the potential social impacts of proposed major projects, however there is room for improvement in regard to how the impacts identified in this paper are considered. EAs do not typically include the application of a gendered lens to considerations of impacts on vulnerable populations such as Indigenous women, although there are no provisions in the EAA that would prohibit the use of such an approach. Table 1 shows that although there are many regulatory touch points with camps, and workers employed in camps, there are few mechanisms to address social impacts outside of consultation with affected Nations and the EA process.

Table 1: Challenges in leveraging existing non-EA regulations to address social and gender impacts

Ministry or Agency Responsible	Legislation/Regulation	Challenge or ability to address social impacts:
Ministry of Health	<i>Industrial Camps Regulation:</i> <ul style="list-style-type: none"> • Focuses on biophysical sanitation requirements (e.g., sanitation, drinking water quality, and safe and sanitary housing) • Applies to camps with a population of 5 or more. Applies to the largest number of camps • Does not require a permit specific to camps, 	<ul style="list-style-type: none"> • May not legally enable considerations of impacts on host communities • Limited/no authority to address mental health, social determinants of health, or well-being of workers and host communities. • Does not include workers housed in lodges, hotels, motels or other temporary accommodations that are not classified as

Ministry or Agency Responsible	Legislation/Regulation	Challenge or ability to address social impacts:
	but camps are required to have permits for drinking water and sewage, if operated independently from any other systems	traditional industrial camps
Human Rights Tribunal	<p><i>Human Rights Code:</i></p> <ul style="list-style-type: none"> Provides protection of human rights including provisions against discrimination 	<ul style="list-style-type: none"> Focus on employment, housing etc. not discrimination and racism experienced in day-to-day
Ministry of Labour	<p><i>Occupational Health and Safety Regulation (OHSR):</i></p> <ul style="list-style-type: none"> The purpose of the OHSR is to promote occupational health and safety and to protect workers and other persons present at workplaces from work-related risks to their health, safety, and well-being 	<ul style="list-style-type: none"> Limited treatment of mental health and workers' well being No provisions for host communities Limited inclusion of off-duty worker time in camps
Ministry of Labour	<p><i>Employment Standards Act:</i></p> <ul style="list-style-type: none"> Ensures that employees in B.C. receive at least minimum standards of compensation and employment 	<ul style="list-style-type: none"> Limited treatment of mental health and workers' well being No provisions for host communities
Environmental Assessment Office	<p><i>Environmental Assessment Act:</i></p> <ul style="list-style-type: none"> Enabling legislation Flexible approach to working with Indigenous governments Currently going through a revitalization process that will likely result in changes to the legislation and supporting regulation and policy Developing socio-economic EA process tools 	<ul style="list-style-type: none"> Limited social and health legislation and regulation to inform EAs, direction to proponents and EA certificate conditions Challenges identifying and accessing cross government social impacts expertise to support project working groups Attributing adverse effects to a specific project
Ministry of Environment and Climate Change Strategy	<p><i>Permits, Environmental Statutes, Land Use:</i></p> <ul style="list-style-type: none"> See Appendix 2 	<ul style="list-style-type: none"> No framework or obligation to address social issues
Ministry of Energy, Mines and Petroleum Resources	<p><i>Mines Act</i></p> <p>The Health, Safety and Reclamation Code for Mines in British Columbia outlines requirements for:</p> <ul style="list-style-type: none"> "lunchrooms and sanitary conveniences," including lunchrooms, toilet facilities, washing water temperatures, piping, etc. exploration camps, generally relating to cleanliness and reclamation. 	<ul style="list-style-type: none"> There are no specific provisions under the Code that outline requirements to consider social impacts Many of the requirements under the Code require compliance with regulations under the jurisdiction of other agencies (e.g. ICR).
Forests, Lands, Natural Resource Operations and	<p><i>Land Act</i> tenures for work camps are authorized under the following operational policies. For example:</p>	<ul style="list-style-type: none"> <i>Land Act</i> tenure applications for industrial camps are referred to First Nations for consultation on Aboriginal rights and title; this consultation process can also be used as

Ministry or Agency Responsible	Legislation/Regulation	Challenge or ability to address social impacts:
Rural Development	<ul style="list-style-type: none"> <u>Industrial</u> <u>General Commercial</u> 	<p>an opportunity to address some of the social issues; i.e.</p> <ul style="list-style-type: none"> the siting location of the proposed camp, A third-party memorandum of understanding between the tenure holder and First Nations community regarding communications etc. The operational policies for industrial and general commercial purposes could reference the policy re: Indigenous Communities and Industrial Camps.
Oil and Gas Commission	<p><i>Land Act</i></p> <ul style="list-style-type: none"> As a single-window regulator for oil and gas activities in B.C., the OGC has authority to issue permits for related activities under specified enactments, including the <i>Land Act</i>. The application process requires Indigenous consultation, rights holder engagement, environmental and archaeological assessments. 	<ul style="list-style-type: none"> Involves Indigenous consultation regarding the location of the camp but does not address its continued operation (e.g. sanitation, policies regarding worker codes of conduct or behaviour, policies, health services). Approvals are required from other jurisdictions in order to construct facilities and operate the camp.^{xxvi}

C.4.2 Opportunities for improvement

Regulatory tools could be used in conjunction with non-regulatory tools to compel industry to consider social impacts of their projects and to change the way that social impacts are managed. Compliance and enforcement of any proposed regulations should also be considered as staffing capacity in rural areas, where many camps are located, can be very limited. Adapting regulations and decision-making processes should aim to identify and break down barriers to give a voice to Indigenous women throughout the engagement, consultation, policy development, permitting and decision-making processes.

For example, changing workplace health and safety regulations could also have a positive impact by proactively preventing social impacts, for example:

- Applying health and safety provisions outside of work hours;
- Including provisions related to mental health and worker wellness; and,
- Changing requirements related to the number of hours and consecutive days (drive in drive out/fly in fly out) workers can work.

Provincial and federal commitments to reconciliation and implementing UNDRIP, the TRC Calls to Action, and relevant case law, have led to increased opportunities for shared decision-making for all decision-

making processes in the Province and recognition of Indigenous jurisdiction over their territories and peoples. This change in cross government approach will also need to be reflected in any potential legislative or regulatory changes related to industrial camps. Changing the approach to regulating industrial camps may need to reflect and respond to desires for more community led assessments and monitoring for major projects and other activities. These are long term and fundamental shifts in how industrial camps are permitted; operated and managed that will require long term solutions^{xxvii}.

C.4.2.1 Environmental assessment process

In July 2017, Minister Heyman of the Ministry of Environment and Climate Change Strategy (ENV), received a letter from Premier Horgan with a mandate to revitalize the EA process that will likely result in changes to the B.C. EAA and the supporting regulation and policy:

“Revitalize the Environmental Assessment process and review the professional reliance model to ensure the legal rights of First Nations are respected, and the public's expectation of a strong, transparent process is met^{xxviii}.”

The EAO is planning for a revitalized EA to come into force in the winter of 2019. Through EA revitalization, there is an opportunity to consider whether criteria should be established in the Reviewable Projects Regulation to require EAs for larger worker camps and to identify the appropriate guidance that would be needed to support the consideration of impacts to Indigenous communities in general and women and children in particular. The EAO would also need access to greater expertise on social impact assessment. EA revitalization could also consider changes to compliance and enforcement of EA Certificate Conditions that would support an adaptive approach to responding to community concerns.

C.4.2.2 Industrial Camps Regulation

The Ministry of Health (MOH) is responsible for the ICR^{xxix}, which falls under the *Public Health Act*. The ICR has provisions for the health and safety of work camps and focuses on the biophysical sanitation requirements such as sewage requirements and the provision of safe drinking water. The mental health, social determinants of health and well-being of workers or host communities does not fall under the ICR.

MOH is undertaking a review of the ICR and is considering a broad scope, but it is not yet clear if or how social impacts could be addressed under this regulatory tool.

Health Authorities are responsible for compliance and enforcement of the ICR. Northern Health has highlighted the challenges in meeting current compliance and enforcement requirements, in part due to its large geographic area with extensive resource industry activity, the number of remote and disparate camp locations and data management systems that do not have Geographic Information Systems capability. Environmental Health Officers are trained to inspect biophysical and sanitation conditions and relevant water and food handling permits.

Multi-day travel on remote logging or forest service roads may be required to access a single camp, which the health authority has limited funding and capacity to do for conducting inspections. In addition, addressing social impacts is multi-disciplinary, and may not be fully addressed within the responsibilities of a health authority.

The Northern Health has created a best management guide for industrial camps to create health and medical service plans^{xxx} that go beyond the minimum legislated (*ICR, Mines Act, WorkSafeBC*, etc.) requirements and seek to better address the impacts to local health services associated with increased industrial activities, while also supporting the health of camp workers. The guidance helps to manage not only worker safety risks, but also non-occupational, non-urgent health care service needs, such as primary care mental health services, sexual health supports and health promotion. A Communicable Disease Plan Best Management Guide for Industrial Camps^{xxxi} and additional harm-reduction recommendations for industrial camps^{xxxii} were also recently released as supplemental guidance.

C.4.2.3 Health and safety

The social determinants of health^{xxxiii} are vital factors to reducing the burden of disease and injury and to limiting disparities in health and well-being both between individuals and amongst various segments of the population. Regulations and standards regarding public health and worker safety do not reflect this emerging priority (See [Appendix 2](#) for examples).

The social determinants of health and more holistic definitions of well-being extend beyond the purview of any single regulatory authority (e.g., WorkSafeBC is responsible for safety at work) or Ministry (e.g., MOH, which does not determine employment or social programming) creating challenges to addressing underlying or systemic drivers of health disparity. Factors affecting the well-being of workers in camps have spillover effects on worker behaviour offsite and outside work. These factors are outside of the definition of health and safety as defined by current regulations and can result in negative impacts on Indigenous women and communities in general. There is a need for an expansion of the definition of health and safety to extend to the well-being for workers and to the social determinants of health for the communities that are nearby to industrial camps.

C.4.2.4 Coordinated planning

There are few venues where agencies and ministries can create relationships and partnerships, share information, and collaborate on initiatives related to the social impacts of natural resource extraction and economic development. There are limited opportunities for communities to engage with provincial authorities and industry on issues related to social impacts, and the onus is often on communities to raise and flag areas of concern.

Communities impacted by trauma may have many urgent and immediate needs leading to limited capacity to identify and address problems or participate in planning and engagement processes^{xxxiv}. The current regulatory approach puts the onus on communities, through consultation and engagement, to

identify and flag areas of concern. Communities most impacted by trauma are not well-positioned to flag social issues as areas of concern.

Various planning models were considered to facilitate information sharing within the different provincial entities involved in regulating industrial camps, with other levels of government and Indigenous communities and with industry. These models included Regional Growth Strategies (B.C. Ministry of Municipal Affairs and Housing, FLNR), cross agency Indigenous relations teams, or industry-led socio-economic tables. These venues could be used to communicate with agencies and communities about a proposed camp and to address concerns before, during and after a camp is in operation. Promising initiatives that could integrate information on camps and take an Indigenous gender-based lens includes FLNR's mandate to undertake land use planning processes. MIRR is recreating the interagency Regional Management Committees, which could also be a forum for inter-agency communication on industrial camps.

However, creating planning forums have a number of limitations which include:

- Too narrow or too broad of focus: Planning forums and tables are typically created for a specific purpose and may have too narrow of a focus (i.e., focus only on select social issues or mandates) or too broad of a focus (focusing on social issues among varying other values, such as environmental, economic, land use planning, etc.) unless designed specifically for this issue;
- Lack of capacity: Planning forums and tables are typically created for a specific purpose and may not have the scope of representation required. Many times, the same people and organizations are asked to engage in different tables and experience limitations in their capacity to participate; and,
- Long and costly: Setting up new models that engage all of the necessary sectors and cover the entire province would be a long and costly process.

Convening people in person is costly. In-person, semi-regular meetings may not be appropriate to camps that are small or highly temporary in nature. Large camps, or those associated with large projects are more likely to have the financial and human resources capacity to engage with Indigenous communities and government. Planning tables and processes should therefore be appropriately scaled to the size of camp.

C.4.2.5 Coordinated strategy

Government has a variety of strategies that could be adapted to include planning for industrial camps. For example, the Rural Economic Development Strategy, coordinated by FLNR, seeks to work with rural communities to strengthen resilience, create jobs and build economic opportunities. The Rural Advisory Council and Rural Dividends program supports these goals. Although many of the identified strategies address one or more components or issues related to camps, there is no one over-arching strategy that would be an appropriate fit for the coordination and planning that would be required for industrial camps of all sectors, sizes and locations across the province while incorporating the unique considerations of Indigenous communities and women.

There are a number of existing organizations and government agencies that offer support or prevention services to and for Indigenous women and children. Government could provide funding to increase available supports to managing the impacts of industrial camps. The Community Coordination for Women's Safety run by Ending Violence Association of BC (EVA BC), assists communities to develop new models or improve cross-sector coordination of responses to violence against women. Violence Against Women in Relationships, run by EVA BC; coordinated work with Indigenous communities and across government on the Social Determinants of Health; and, Integrated Case Assessment Teams run by The B.C. Ministry of Children and Family Development are all efforts to improve coordination and policy responses of various sectors and people involved in preventing and responding to violence.

The Aboriginal Liaison Program (ALP), coordinated by FLNR, OGC and EMPR, also links training opportunities and monitoring of natural resource projects with Indigenous communities. Specifically, ALP agencies partner with Indigenous groups to develop liaison and monitoring projects tailored to their interests, concerns, and technical capacity. The ALP supports creating greater Indigenous community awareness of natural resource development, safety, environmental and emergency management, and restoration activities by providing for liaisons within the community. Programs like ALP can be used as a model for addressing social impacts of resource development, focusing on opportunities for community-based responses to violence against women, and other impacts of resource development.

C.5 Supporting Indigenous women and children through community funding and social services

Funding for health authorities and social services (provided by regional authorities, municipalities, provincial agencies, etc.) are determined using information on permanent, resident populations and does not account for higher demand from transient camp and non-camp workers operating in the region^{xxxv}. It has been suggested that camp workers contribute to inequity in health services available to rural/remote populations and that transient workers put a potential strain on available health and social resources when accessing these services^{xxxvi}. Industrial camps and boom-bust resource economies can also put increased demands on particular services (i.e., drug and alcohol counselling, sexual assault response) while rapid swings in economic and demographic conditions associated with boom-bust resource economies can be hard to accommodate, even when funding is available. Widening income inequality, rising costs of living, increased instances of sexual violence and other social impacts in areas of intense resource development also likely result in increased service needs for the permanent population.

Although camps are dispersed across B.C., Northern Health is responsible for an area with a high proportion of industrial activity and camps. This region is geographically large, and work camps are dispersed across large areas. Recruiting and retaining health care professionals to remote and rural areas can be difficult. This can be even more difficult in areas of high industry activity due to the associated high costs of living and competition from industry offering high wages. Ensuring all populations have access to services can therefore be challenging.

As a result, camps that do not provide amenities may place a strain on the proximate community. The additional demand for services created by industrial camps can negatively impact both camp workers' and Indigenous communities' access to services.

Indigenous communities have limited funding and capacity to prepare for, prevent or monitor and adapt to impacts in their communities, including to conduct safety planning, family, financial, harm reduction or anti-violence programming and monitoring related to proposed or active camps in their territories. Limited social programs (beyond employment and training) are available to respond to the social impacts of resource development from a holistic perspective and program funding is often only available on a year to year basis which can limit the effectiveness of program delivery. Allocating resources to communities can enable initiatives specific to local contexts and projects, and have direct positive impacts on people in communities. These investments support the governance and institutional capacity of communities for co-management of the impacts of resource development, and informed co-decision on proposed projects in their territories.

Initiatives that could assist in addressing the challenges associated with the delivery of health and social services include:

- Ensuring that services are designed to maximize the continuity of care for workers. Transient workers should have access to services both during their camp stay and while in their home community;
- Leveraging existing programs and services that support women by offering dedicated long term funding, especially in regions of high industrial activity; and,
- Including social services support in Impact Benefit Agreements (IBAs);
- Developing alternative funding arrangements for health and social service agencies to account for the service needs of non-resident populations and are proportionally allocated dependent on the capacity level of the health authority relative to the volume and scale of the industrial projects in the region;
- Working with communities to identify health and social service needs that reflect the realities of fluctuating impacts of industrial development;
- Providing enhanced funding (from the Province or through industry partnerships) to relevant organizations and entities:
 - Partnering with organizations and entities to provide funding for services in areas of high industrial activity that considers transient populations. Funding for services should be flexible to adapt to rapid fluctuations in transient work populations and increased burden on existing services and infrastructure;
 - Health and social agencies can be well positioned to work with industry, relevant provincial permitting ministries and agencies and indigenous communities to address some of the impacts identified here. However, they often have limited capacity and undefined mandates in this area. For instance, the Northern Health's Office of Health and Resource Development holds relationships with various stakeholders on some of these issues, but their effectiveness and abilities are limited by capacities, often

- requiring them to risk manage between different processes and initiatives (e.g., EA process, permitting, provincial initiatives, etc.);
- Some health authorities have expertise in relation to the impacts of resource development on health and /or key partnerships with academic institutions.
- Making funding available for community preparedness coordinators for Indigenous communities that are in close proximity to large camps. Preparedness coordinators could provide links to existing initiatives and improve coordination, collaboration and information sharing when responding to sexual assault cases (e.g., Sexual Response Assault Teams and Sexual Assault Community Protocols).

D. Conclusion

The social impacts of natural resource development and accompanying industrial camps, including gendered impacts, extend beyond the mandate of any one ministry or agency and addressing them will require a collaborative and coordinated approach. A number of issues were identified by the Working Group and in initial targeted scoping conversations. While there are some issues identified in this paper that individual ministries could address to enhance prevention and management of social impacts, some issues require long term and fundamental shifts in the way industrial camps are permitted, operated and managed. Prioritizing and scoping actions to address these concerns would require dedicated capacity and in-depth engagement to capture the diverse experiences of Indigenous and non-Indigenous communities proximate to industrial camps and to ensure that actions and changes are developed with, and are responsive to, the needs of Indigenous peoples, communities, and industry.

Coordination is needed with priority initiatives already underway across the province (i.e., EA revitalization and development of GBA+ in B.C.). As a cross sector and emergent issue, additional analysis requires a whole of government and iterative approach, in collaboration with Indigenous governments and peoples, industry, municipal and federal governments, and service providers and agencies.

Development of provincial actions will require endorsement by Provincial Deputy Ministers, significant coordination across ministries and further engagement with Indigenous women, Indigenous organizations, industry, external organizations and local government and service providers.

The process in developing this Discussion Paper also identified a lack of understanding of current camp management practices and related corporate policies. Deputy Ministers have endorsed the development of a case study with major project proponents. The intent of the case study is to investigate and inform the Province as to what tactics and best practices can be used for consideration of future regulatory improvements, regarding the planning and operation of industrial work camps in BC. The case study will also provide an opportunity to engage individuals including local government and First Nations representatives, Indigenous women, primary contractors, provincial entities and others as identified that participated in the development of industrial camp planning measures. Engagement will aim to

explore their views on what works well in the current process of planning for industrial work camps, and opportunities for future improvement. The case study will conclude with an analysis of this information and explore gaps and opportunities on how the Province, First Nations and industry can work together towards continuous improvement and identify how concerns related to industrial work camps can be addressed.

The case study also represents a potential opportunity to explore new opportunities for piloting new approaches during the potential construction phases of the proponent's projects.

In addition, Deputy Ministers have endorsed MIRR to continue working with line ministries to articulate, align and leverage activities already underway across government to better consider the social and health impacts of industrial camps on Indigenous communities. Findings from both the case study and MIRR's continued policy scoping work will be presented to Deputy Ministers in early 2019.

Endnotes

ⁱ Aalhus, M. (2018). The social determinants of health impacts of resource extraction and development in rural and northern communities: A summary of impacts and promising practices for assessment and monitoring. Prepared for Northern Health and the Provincial Health Services Authority

ⁱⁱ The definition of industrial camps in the Discussion Paper is based on the definition provided in the *BC Guidelines for Industrial Camps Regulation* but differs with the inclusion of accommodations provided by a third party supplier. The ICR specifies it does not apply to third party supplier accommodation or amenities as they are regulated in the same manner as hotels.

ⁱⁱⁱ Workers housed in an industrial camp are referred to as worker residents in this paper.

^{iv} Aalhus, M. (2018). The social determinants of health impacts of resource extraction and development in rural and northern communities: A summary of impacts and promising practices for assessment and monitoring. Prepared for Northern Health and the Provincial Health Services Authority; and, https://www.northernhealth.ca/Portals/0/Your_Health/Programs/Public%20Health/OfficeHealthResourceDevelopment/impacts-and-promising-practices-for-assessment-monitoring.pdf; and, First Nations Health Authority and Northern Health (2015). Health and Resource Development Impacts and Overview; Northern First Nations Caucus Overview of Sub-regional Engagement Sessions, <http://www.fnha.ca/Documents/FNHA-Northern-First-Nations-Caucus-Overview-Fall-2015-Full-Report.pdf>

^v These include positive and negative impacts to employment and income; formal and informal economic activities; work conditions; food security; housing and cost of living; pressure on health care systems; education; connections to the land and waters; cultures; life control, self-determination, and self-governance; social relationships; mental health, substance use, and family dynamics; community safety and crime; sexual health, sex work, and sex trafficking; and gender.

^{vi} Jones, E. (2017). 'No free, prior and informed consent': Rape culture in boom and bust towns. Discourse Media. <http://discoursemedia.org/gender-and-identity/Indigenous-women-violence-resource-extraction> & Jones, E.

(2018) Violence against women in Canada: We have national data, and we're sharing it. Discourse Media.

<https://www.thediscourse.ca/gender/violence-against-women-canada-data-sharing>

vii TRC (2015), as cited in the Firelight Report, pg. 8.

viii The Firelight Report

ix Government of Canada (2018). Budget 2018's Gender Results Framework.

<https://www.budget.gc.ca/2018/docs/plan/chap-05-en.html>

x Minister's Advisory Council on Indigenous Women,

<https://www2.gov.bc.ca/gov/content/governments/Indigenous-people/minister-s-advisory-council-on-Indigenous-women-maciw/maciw-vision-mission>

xi University of Northern British Columbia. Community Development Institute (2015a): "Lessons Learned in Work Camp-Community Relations: Practices Making a Positive Difference"

[http://www.unbc.ca/sites/default/files/news/40513/lessons-learned-work-camp-community-relations-practices-making-positive-difference/lessons learned in work camp-community relations - final march 2015.pdf](http://www.unbc.ca/sites/default/files/news/40513/lessons-learned-work-camp-community-relations-practices-making-positive-difference/lessons%20learned%20in%20work%20camp%20community%20relations%20-%20final%20march%202015.pdf)

xii Applications for industrial camps under the *Land Act* are referred to First Nations for consultation. This could provide an opportunity to discuss issues with regard to siting location of a proposed camp.

xiii Source: Status of Women Canada. (2014). *The peace project: gender-based analysis of violence against women and girls in Fort St. John*.

https://thepeaceprojectfsj.files.wordpress.com/2014/03/the_peace_project_gender_based_analysis_amended.pdf

xiv This could be linked to a Worker Code of Conduct or serve as a reminder to camp workers renting in town about their responsibilities under the *Residential Tenancy Act*.

xv This does not include smaller, more transient camps that are difficult to track (e.g. exploration, silviculture). With the exception of logging camps, it is not known which camps are active, proposed for future development or retired and inactive. Northern Health (2012). Part 1: Understanding the State of Industrial Camps in Northern BC: A Background Paper.

<http://lginnorthernbc.ca/images/uploads/documents/UnderstandingStateofIndustrialWorkCamps-NorthernHealth-Oct2012.pdf>

xvi This map uses three datasets on DataBC and information provided by FLNRORD replicating Northern Health's Methodology. For more details see Fionda, F. & Jones, E. (2018). In search of Canada's elusive shadow population.

<http://discoursemedia.org/data/canadas-shadow-population>

xvii Northern Health stresses that their information on camps is incomplete and to use these numbers with caution. The data only represents camps that have applied and received permits and does not necessarily represent the total number of camps in the region or camps that are active.

xviii See <http://lodgeline.com/> for a diverse suite of accommodations used by mobile workforces.

xix Aalhus, M. (2018). *The social determinants of health impacts of resource extraction and development in rural and northern communities: A summary of impacts and promising practices for assessment and monitoring*. Prepared for Northern Health and the Provincial Health Services Authority.

xx Indicators should reference the broader social determinants of health. The Office of the Provincial Health Officer has developed 22 indicators that could be used. Regional Health and Wellness plans developed by First Nations could also inform these indicators.

xxi BC Chamber of Commerce (2014). "Industrial Camps Near or Within Municipalities and their Effects on the Economy." *BC Chamber of Commerce Policy*. <http://www.bccchamber.org/policies/industrial-camps-near-or-within-municipalities-and-their-effects-economy>

xxii Truth and Reconciliation Commission of Canada. (2014). Truth and Reconciliation Commission of Canada: Calls to Action. http://www.trc.ca/websites/trcinstitution/File/2015/Findings/Calls_to_Action_English2.pdf

xxiii Trauma is a set of normal human responses to stressful and threatening experiences.

^{xxiv} The Minister of Environment and Climate Change’s Mandate letter includes the mandate to revitalize the Environmental Assessment Process.

^{xxv} Government of Canada (2015). Corporate Social Responsibility (CRS) Checklist for Canadian Mining Companies Working Abroad. <http://www.nrcan.gc.ca/mining-materials/mining/corporate-social-responsibility/17152>

^{xxvi} Approval from Other Jurisdictions for Camps Guidance <https://www.bcogc.ca/node/13338/download>

^{xxvii} For instance, in Australia, multiple parliamentary inquiries at the State and Federal level included widespread engagement and input from industry and expert witnesses to put forward recommendations and, in some cases, new legislation to improve Fly-in-Fly-out and Drive-In-Drive-Out practices across the country.

^{xxviii} <https://www2.gov.bc.ca/assets/gov/government/ministries-organizations/premier-cabinet-mlas/minister-letter/heyman-mandate.pdf>

^{xxix} The ICR applies does not apply to camps with fewer than 5 people and that are established to meet emergency conditions and occupied for a period of not more than 7 days.

^{xxx} https://www.northernhealth.ca/Portals/0/Your_Health/Programs/Public%20Health/OfficeHealthResourceDevelopment/2015-03-HMSP.pdf

^{xxxi} https://northernhealth.ca/sites/northern_health/files/services/office-health-resource-development/documents/communicable-disease-control-BMG.pdf

^{xxxii} https://northernhealth.ca/sites/northern_health/files/services/office-health-resource-development/documents/overdose-prevention-camps.pdf

^{xxxiii} The determinants of health are a mix of social, economic and personal factors that can work together or independently to influence the ability of people to make lifestyle choices, sometimes positively and sometimes negatively. They include income/social status; social support networks; education; employment/working conditions; social environments; physical environments; personal health practices and coping skills; healthy child development; biology and genetic endowment; health services; gender; and culture. From: Provincial Health Officer. Investing in prevention: improving health and creating sustainability. The Provincial Health Officer’s special report. Victoria, BC: Ministry of Healthy Living and Sport; 2010 Aug.; and, Public Health Agency of Canada. What makes Canadians healthy or unhealthy? Ottawa, ON: Public Health Agency of Canada [modified 2003 Jun 16; cited 2012 Oct 9]. Available from: <https://www.canada.ca/en/public-health/services/health-promotion/population-health/what-determines-health/what-makes-canadians-healthy-unhealthy.html>

^{xxxiv} Weinstein, Wolin and Rose (2014) argue “trauma manifests at the family and community level by altering social networks and reducing community capacity to collectively identify and address its problems and plan for its future. Trauma can undermine “readiness” for individual and community change” (p.7)

^{xxxv} Note: municipalities in Northeastern BC receive additional funding to compensate for the impacts of resource development. These agreements funded local governments, do not consider the potential gendered impacts or service requirements of resource development and did not explicitly allocate funding for Indigenous service provision.

^{xxxvi} For example, by displacing resident populations through reduced housing availability, access to common services etc. see Northern Health (2015) Health and Medical Services Plan Best Management Guide for Industrial Camps. https://northernhealth.ca/sites/northern_health/files/services/office-health-resource-development/documents/industrial-camps-BMG.pdf

Appendices

Appendix 1: Ministries, Agencies and Organizations represented on the Working Group as of September 2018

- Energy, Mines and Petroleum Resources
- Indigenous Relations and Reconciliation
- Municipal Affairs and Housing
- Advanced Education and Skills Training
- Labour
- Children and Family Development
- Health
- Forest, Lands, Natural Resource Operations and Rural Development
- Public Safety and Solicitor General
- Transportation and Infrastructure
- Environmental Assessment Office
- BC Hydro
- WorkSafeBC
- Lake Babine Nation
- Nak'azdli Whut'en
- Minister's Advisory Council on Indigenous Women
- Northern Health
- Gender Equity Office at Ministry of Finance
- Oil and Gas Commission

Appendix 2: Applicable Regulations to Industrial Camps

Factors determining applicable regulations

Project Size: Thresholds outlined by the *EAA* determine whether a project is reviewable. If yes, social impacts are considered in the EA Process.

Camp Size: Camps over 5 people are regulated by the *Public Health Act* - ICR.

Type of Land: Permits are required for Crown and Agricultural Reserve Land. If projects require land use permits, conditions can be set out for these uses. Camps on Private lands do not require the same permitting.

Local government: Municipal and Regional Districts have the authority develop by-laws impacting camp operations and permit requirements.

Industry: Camps associated with different industries have different requirements, e.g. temporary camps can be authorized through the *Mine's Act*.

Location of Camp in project area: Camps within the Mine Fence Area are under the *Mines Act*, but the *Mines Act* does not oversee bunk houses, which are regulated under the This jurisdictional overlap causes confusion for compliance and enforcement.

Amenities of Camp: Water, food handling, and sewage permits are necessary for camps of varying sizes.

Location of Camp/Land Use on Traditional Territories: Consultation and accommodation with Indigenous governments is required for certain land use decisions.

Discussion of regulations

Industrial camps over 5 people, and not used for emergency purposes are regulated through the *Public Health Act*- Industrial Camps Regulation (*BC Reg 417/83*)¹, which focuses on the personal hygiene, sanitation, and biophysical safety of industrial camps (e.g., dwelling size, availability and specifications of washing facilities, sewage and water). ENV has responsibility or authority under more than 30 statutes, many of which relate to industrial camps (p.66²). FLNR is responsible for issuing permits to mining, forestry, and oil and gas companies operating on Crown Lands for a range of activities such as tenure

¹ Government of British Columbia. REG 417/83. Industrial Camps Regulation- *Public Health Act*.

http://www.bclaws.ca/civix/document/id/loo99/loo99/70_2012

² W. Beamish Consulting Ltd. & Heartwood Solutions Consulting (2013). "Policy, communications, capacity: A time to lead. Scoping the impacts and benefits of work camps in the Peace Region" *Prepared for Peace River Regional District*. http://prrd.bc.ca/board/agendas/2013/2013-15-8827692533/pages/documents/4bPolicyCommunicationsCapacity-Atimetolead_June25_001.pdf

and clearing.³ The OGC has authority under specified enactments to review the location of oil and gas camps on Crown Land and issue permits related to tenure and associated environmental considerations.

In addition, projects operating within municipal or regional district boundaries may be subject to by-laws that vary across jurisdiction, making it difficult to compile the necessary permits and licenses a hypothetical project might require. Further variation in the permitting and licensing process is introduced when comparing projects from different sectors. For instance, major mineral developments, and peripherally the camps associated with these projects, are permitted through EMPR, who coordinate a review panel in determining provincial authorization of a project, which differs from oil and gas, which is permitted through OGC. It has been suggested that this leads to limited coordinated oversight, challenges with jurisdiction for enforcement and compliance, and inconsistent approaches across sectors (see Table 2 for more details on factors determining applicable regulations).

Table 2: Regulations and Legislation Applicable to Industrial Camps (compiled from W. Beamish Consulting Ltd & Heartwood Solutions Consulting (2013); OGC (2016); and BC government staff)

Note: this is not an exhaustive list rather here to demonstrate the number of touchpoints and authorities that can be involved in permitting and oversight.

Regulation/Legislation	Enforcing Agency	Application to Work Camps
<i>Sewage Disposal Regulations (BC Reg 411/85)</i>	MOH Health Protection Branch, Health Authority, Environmental Health Office	Primary legislation applying to all industrial camps >5 people
<i>Drinking Water Regulations (BC Reg 230/92)</i>	MOH Health Protection Branch, Health Authority, Environmental Health Office	Primary legislation applying to all industrial camps >5 people. Drinking water requirements for human consumption, food preparation or sanitation
<i>Food Premises Regulation (BC Reg 210/99)</i>	MOH Health Protection Branch, Health Authority, Environmental Health Office	Primary legislation applying to all industrial camps >5 people, Food intended for public consumption
<i>Public Health Act, Sewerage System Regulation</i>	MOH, Health Protection Branch, Health Authority	If effluent does not exceed 22,700 litres/day or is reused. Camps under 100 people
<i>Environmental Assessment Act</i>	ENV- EAO	When projects are over legislated thresholds
<i>Environmental Protection Act</i>	ENV	E.g., when there is presence of

³ Ibid, p 69.

		or planned industrial waste
<i>BC Electrical Safety Act</i>	Technical Safety BC	
<i>Building Act / BC Building Code</i>	Local governments (where building inspections services exist)	Applies to any buildings other than temporary site offices and seasonal storage buildings. Includes requirements for factory built modular housing or buildings.
<i>Workers Compensation Act & Occupational Health and Safety Regulation</i>	WorkSafeBC	For workers on site, as well as camp planning, e.g., when storing or handling flammable substances. <i>Part 25 Specific to Camps</i>
<i>Fire Services Act</i>	BC Fire Commission	Storing fuel or re-fuelling facilities
<i>Water Sustainability Act</i>	ENV, Regional Water Management Branch, Health Authorities	If water for camp operation is taken from any surface source other than a well, a licence for long term operations or approval for operations up to 12 months is required
<i>Environmental Management Act- Municipal Sewage Regulation</i>	ENV, Environmental Protection Office	If effluent exceeds 22,700 litres/day and is not reused
<i>Environmental Management Act- Spill Reporting Regulation</i>	ENV, Regional Environmental Protection Office, Regional Waste Manager	E.g., if there are spills or soil contamination and waste disposal
<i>Environmental Management Act- Open Burning Smoke Control Regulation</i>	ENV- Environmental Protection Office	E.g., when burning waste (for disposal)
<i>Environmental Management Act- Hazardous Waste Regulation and Legislation Guide</i>	ENV, Regional Environmental Protection Office	Generation, storage and transport of waste
<i>Litter Act</i>	ENV	
<i>Landfill Criteria for Municipal Solid Waste</i>	ENV	
<i>Oil and Gas Waste Regulation</i>	ENV	
<i>Waste Discharge Regulation</i>	ENV	
<i>Forest Act</i>	FLNR/OGC	Removal of Crown timber within the activity area
<i>Forest and Range Practices Act</i>	FLNR	

<i>Environment and Land Use Act</i>	FLNR	
<i>Land Act</i>	FLNR/OGC	Occupation and use of Crown Land. <i>Land Act tenures for work camps are authorized under the following operational policies; i.e.</i> <ul style="list-style-type: none"> • <u>Industrial</u> • <u>General Commercial</u>
<i>Land Titles Act</i>	FLNR	
<i>Mines Act- Health, Safety and Reclamation Code for Mines</i>	EMPR	The Health, Safety and Reclamation Code for Mines in British Columbia outlines requirements for: <ul style="list-style-type: none"> • “lunchrooms and sanitary conveniences,” including lunchrooms, toilet facilities, washing water temperatures, piping, etc. • exploration camps, generally relating to cleanliness and reclamation.
<i>Petroleum and Natural Gas Act</i> <i>Oil and Gas Activities Act</i>	OGC	Issue permits for Oil and Gas activities on Crown Lands. Camps sites are regulated under specific legislation including the Land Act, Forest Act, etc.

Citations

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