

Memo on Intersectionality and Gender Based Analysis Plus (GBA+) in Impact Assessment May 26, 2025

GBA+

The origins of Gender-Based Analysis Plus [GBA+] can be traced back to the establishment of the Women's Bureau in 1953, which marked the emergence of 'state feminism' in Canada. The Bureau's impact on policy development led to a 'women's state' in Canada in the late 1970s and early 1980s. The women's state would later disassemble and be replaced by 'gender mainstreaming'. By signing the UN's Fourth World Conference on Women, Canada committed to adopting gender mainstreaming approaches within their bureaucracies. Canada realized its commitment through a Federal Plan for Gender Equality, which implemented 'Gender-Based Analysis [GBA]' throughout federal departments and agencies. In 2011, GBA received an update and became GBA+ (the "+" signifies the addition of an intersectional component).

Today, GBA+ is the Government of Canada's primary framework for attending to diversity and inclusion in public policy. GBA+ has been used in various contexts by the federal government, including economic and fiscal policymaking; Canadian impact assessment law; parental leave policies; and military and defence policy.

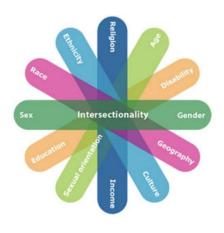
GBA+ and Impact Assessment

As development and extractive projects continue to progress, it is crucial to ensure that policies, projects, and impact assessments prioritize the needs and experiences of marginalized communities. GBA+ is meant to address the relationship between gender



identity groups and their access to or interactions with services, resources, and activities. When contemplated as part of an assessment, GBA+ asks us to consider the needs, risks, impacts of decisions relating to the proposed project on gender identity groups at each stage of the impact assessment process. It also asks us to consider what, if any, mitigation measure must be put in place to address the anticipated impacts.

GBA+ in impact assessment begins to recognize the long-standing recognition that state interventions with roots in colonial structures reify power dynamics which privilege some groups of people over others. A clear application of this system surrounds industrial scale resource-based development projects, which have well-documented and disproportionate negative impacts on constituents of different identity groups, including women, Indigenous peoples, LGBTQ2S, disabled persons, etc. GBA+ also recognizes intersectionality, in that some individuals experience a combination of different identity factors. Identity is not uniform but includes multiple elements that influence reality and power.



As summarized by Johnston, Walker, and Hoogeveen (2024, p. 3) "marginalized groups disproportionately bear the burden ... while also facing greater barriers to accessing the perks that may flow from it." In the context of mining, for example, Dempsey, Doebeli, Hoogeveen,

¹ https://women-gender-equality.canada.ca/gbaplus-course-cours-acsplus/eng/mod02/mod02_03_01a.html.



Quinn, and Sosa-Aranda (2023) document evidences of economic vulnerabilities, domestic violence, substance abuse, family disruption, sexual violence, workplace safety challenges, among others.

Two significant frameworks that address these needs are the *Indigenous Gender-Based Analysis Plus (IGBA+) Toolkit* and *Inspiring Change: A Community and Activist Guide to Intersectional Gender-Based Analysis and Impact Assessment in Canada*. These frameworks offer unique perspective and tools to integrate gendered and intersectional lenses into decision-making processes, particularly in relation to resource development projects and Indigenous rights, ensuring that the voices of Indigenous women, girls, Two-Spirit, and gender-diverse individuals are heard.

The **IGBA+ Toolkit** provides a comprehensive approach to address the unique harms faced by Indigenous women and gender-diverse individuals, with a focus on equity, social justice, and the restoration of traditional roles disrupted by colonialism. It offers seven guiding principles and four key areas (or "berry baskets") where IGBA+ is applied: government, industry, Indigenous communities, and Indigenous women/gender-diverse individuals. By integrating IGBA+ into Impact Assessments (IAs), governments and industries can ensure that Indigenous women's rights are respected, their participation in decision-making is promoted, and development practices are culturally sensitive and sustainable. Further information is found in Appendix A to this document.

Inspiring Change, developed by Oxfam Canada, offers guidance for activists and community members navigating the federal impact assessment process. It focuses on the intersectional gendered impacts of resource development projects on marginalized communities, including Indigenous women, gender-diverse individuals, and other vulnerable groups. The guide emphasizes the need for community-led, intersectional gender impact assessments to ensure that diverse voices, especially those marginalized by systemic oppression, are considered in decision-making. It outlines a six-step process for conducting these assessments, which includes planning, background research, community engagement, assessment drafting,



advocacy for change, and ongoing monitoring. Further information is found in Appendix B to this document.

Together, these frameworks ensure that development projects consider the diverse and intersectional impacts on marginalized communities, fostering more inclusive, equitable, and sustainable outcomes. By centering the experiences of affected groups, they support long-term empowerment, resilience, and the restoration of Indigenous governance and cultural practices.

GBA+ Criticisms

Nevertheless, GBA+ has received practical and conceptual criticisms. Many critics have called into question the potential of GBA+ to serve as a mechanism for transformative policymaking.

² GBA+ has been criticized for its siloed and inconsistent implementation (e.g., this criticism has appeared in audits carried out by the Office of the Auditor General in 2009, 2015 and 2022).

³ In addition to this practical criticism, four interlocking conceptual criticisms of GBA+ have been identified: (1) its weak integration of intersectionality (and overreliance on an 'additive approach');

⁴ (2) insufficient attention to the power structures that shape social relations and policymaking;

⁵ (3) an instrumental understanding of policy;

⁶ and (4) a misreading of how identity is produced, performed and reinforced.

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² Cameron & Tedds at 12.

³ Cameron & Tedds at 12.

⁴ Cameron & Tedds at 13.

⁵ Cameron & Tedds at 13.

⁶ Cameron & Tedds at 13, 16.

⁷ Cameron & Tedds at 13.



Appendix A

Indigenous Gender Based Analysis Plus (IGBA+) Toolkit - MACIW

The *IGBA+ Toolkit* offers a comprehensive framework designed to address the unique harms and challenges faced by Indigenous women, girls, Two-Spirit, and gender-diverse individuals.⁸ It provides a set of guiding principles and practical tools to help government, industry, Indigenous communities, and Indigenous women themselves integrate these groups' perspectives into decision-making processes, particularly in relation to policies, development projects, and impact assessments. The framework emphasizes equity, social justice, and the restoration of traditional roles that were historically disrupted by colonialism.

Core Framework and Purpose

IGBA+ is built on principles of self-determination, inclusion, and equity, with a particular focus on the lived experiences of Indigenous women, girls, Two-Spirit, and gender-diverse individuals. The framework acknowledges the historic exclusion of these groups from governance and decision-making, highlighting the need to address the impacts of colonization, systemic racism, and patriarchy. Through IGBA+, policies are designed to uplift marginalized voices, allowing Indigenous women and gender-diverse individuals to actively shape the decisions affecting their lives, lands, and communities.

Key Features of IGBA+

1. Seven Guiding Principles9

These principles prioritize:

⁸ Ministers Advisory Council on Indigenous Women (MACIW), *Indigenous Gender Based Analysis Plus (IGBA+) Toolkit: Created for Meaningful Application by Federal/Provincial Government, Corporations, Indigenous Communities and Indigenous Women, Girls, Two-Spirit and Gender-Diverse Individuals.* (2024), online (pdf): https://www2.gov.bc.ca/assets/gov/british-columbians-our-governments/indigenous-people/aboriginal-peoples-documents/maciw_igba_toolkit.pdf [MACIW].

⁹ *Ibid* at 8, 23-25.



- o Inclusion of Indigenous women's voices.
- o A healing centred approach¹⁰
- Culturally appropriate frameworks, such as land-based and ceremonial methods, for policy analysis.
- o Indigenous women's experiences as a critical lens for decision-making.

2. Four Berry Baskets¹¹ of IGBA+ Application

The framework is represented by four key sectors where IGBA+ is applied:

- Government
- Industry
- o Indigenous Communities
- o Indigenous women and gender-diverse individuals themselves.

Each "basket" has tailored guidelines to help stakeholders navigate their specific roles in advancing IGBA+ within their sector.

IGBA+ and Impact Assessment (IA)

IGBA+ is essential in IAs, particularly those concerning development projects on or near Indigenous lands, such as extractive projects, which have shown to have disproportionately negative impacts on Indigenous women and gender-diverse individuals.¹² It ensures that Indigenous women's perspectives are integrated into government policies, industry practices,

¹⁰ *Ibid* at 23, An approach centered on healing and consent rather than focusing on trauma-informed approaches better encompases the totality of an individual's experience.

Patch, "Prior to entering the berry patch, there are some essential things to remember to do in preparation. Identifying which berry patch you would like to visit, is it where your family have picked before or is it a new area, if it is new do you need to check in with other families to seek permission to enter and pick, what's the history of the berry patch, who should be with you when you go there, who should be with you when you go to pick, and what are the protocols, guidelines, and practices that need to followed when you are there to ensure proper preservation. Similarly, to entering a new berry patch, this IGBA+ toolkit is entering new territory for those who are called to embark on this new important journey for social justice for Indigenous women, girls, Two-Spirit, and gender diverse individuals. Those who choose to enter this "berry patch" may have experience working with Indigenous communities but might not have applied this lens on the journey. So, similar questions need to be asked as suggested in the introduction."

¹² *Ibid* at 22.



and the environmental and socio-economic impacts of development projects. By embedding IGBA+ into IAs, governments and industries can ensure they respect Indigneous women's rights, promote their participation in decision-making, and support sustainable, culturally-sensitive development practices.

Berry Basket 1: IGBA+ in Government¹³

- IGBA+ can be integrated into governmental policies, programs, and impact
 assessments to address the historical marginalization of Indigenous women and
 gender-diverse peoples. This integration helps ensure free, prior, and informed
 consent and the recognition of inherent rights, particularly in areas such as land-use,
 treaties, and resource development.
- IGBA+ can help governments build better relationships with Indigenous communities by emphasizing the meaningful participation of women and gender-diverse individuals in governance processes.

Berry Basket 2: IGBA+ in Industry¹⁴

- IGBA+ addresses the historical exclusion of Indigenous women from resource extraction decision-making. By incorporating this framework, industries can mitigate the negative effects of development projects, fostering more inclusive consultation processes that account for gendered and cultural concerns.
- The framework encourages industries to adopt a gendered lens in environmental assessments, ensuring that the unique socio-economic and environmental impacts on Indigenous women and gender-diverse people are recognized and addressed.

Berry Basket 3: IGBA+ in Indigenous Communities¹⁵

• Within Indigenous communities, IGBA+ provides a pathway to restore the central role of Indigenous women in decision-making. Communities can integrate IGBA+ into their

¹³ *Ibid* at 25-28.

¹⁴ Ibid at 29-33.

¹⁵ *Ibid* at 34-37.



- governance structures, policies, and decision-making processes, and by forming Indigenous Women's Councils, they can ensure that IGBA+ is implemented holistically.
- IGBA+ also strengthens community engagement with external stakeholders such as governments and industries, ensuring that Indigenous women's concerns are central to any agreements or negotiations.

Berry Basket 4: IGBA+ for Indigenous Women, Girls, Two-Spirit, and Gender-Diverse Individuals¹⁶

- IGBA+ acknowledges the intersectional nature of colonial violence, gender, and racism as they affect Indigenous women and gender-diverse individuals. It is designed to address multi-generational trauma while promoting healing, self-determination, and empowerment through the inclusion of their voices in decision-making processes.
- By emphasizing the holistic understanding of health and well-being, IGBA+ incorporates the spiritual, mental, emotional, and physical needs of Indigenous women and gender-diverse peoples into governance and development models.

The integration of IGBA+ in IAs, governance, and policy development offers a transformative approach to addressing the impacts of colonialism on Indigneous women, girls, Two-Spirit and gender-diverse individuals. It is a framework that promotes inclusivity, healing, and the restoration of traditional roles within Indigenous communities. By centering the voices of Indigenous women and gender-diverse peoples, IGBA+ enables more just and equitable policy decisions and fosters stronger, more resilient communities.

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¹⁶ *Ibid* at 38-41.



Appendix B

Inspiring Change – A community and activist guide to intersectional gender-based analysis and impact assessment in Canada – **Oxfam Canada 2023**

This resource is designed to assist activists and community members in navigating the federal impact assessment process in Canada, particularly with a focus on the intersectional impacts of resource development projects. It is aimed at a wide range of people, including land defenders, whistleblowers, concerned citizens, and frontline service providers, especially those working with marginalized communities.¹⁷

This guide goes beyond providing a step-by-step outline of the impact assessment process; it also serves as an advocacy tool. It encourages community members and activists, particularly those marginalized by systemic oppression (based on factors such as gender, race, ethnicity, sexual orientation, gender identity, disability, and age), to ensure that their voices are heard and considered in impact assessments.

Gendered Impacts of Resource Development

Resource development projects can bring economic benefits to a region, but they also carry significant negative impacts on communities, particularly in the realms of environmental degradation, health, human rights violations, and gender-based disparities. ¹⁸ These projects often affect people in different ways depending on their identity factors (such as gender, race, and socio-economic status). Key gendered impacts highlighted include:

 Job Disparities: High-paying industry jobs are often more accessible to cisgender, non-Indigenous men, which can deepen gender inequalities within households and communities.

¹⁷ Impact Agency of Canada, *Insipring Change – A community and activist guide to intersectional gender-based analysis and impact assessment in Canada*, (Ottawa: Oxfam Canada, April 2023), online: (pdf) < https://www.canada.ca/content/dam/iaac-acei/documents/research/inspiring-change.pdf [Oxfam].

¹⁸ *Ibid* at 9.



- **Limited Access for Women**: Women are often less likely to access high-paying jobs in the resource sector due to gender discrimination, care responsibilities, and a lack of adequate support systems like childcare.
- **Strained Social Services**: The influx of men migrating to resource development communities can strain local health and social services, disproportionately affecting marginalized groups.
- **Increased Gender-Based Violence**: The arrival of large numbers of men often leads to increased violence, particularly against women, girls, and gender-diverse individuals, with Indigenous women being especially vulnerable.
- Housing and Food Insecurity: The economic boom from resource development can
 push up prices, making housing and food inaccessible for vulnerable community
 members.

The guide stresses that the impacts of resource projects on gender-diverse, Indigenous, and other marginalized groups need more attention, as these groups are often overlooked in the assessment process.

Gender-Based Analysis Plus (GBA+) in Impact Assessments

GBA+ is an intersectional approach used to assess how different gender identities (women, men, and gender-diverse people) and other factors (such as race, disability, age, and sexual orientation) affect people's experiences with policies, projects, or programs.¹⁹ In the context of impact assessments, **GBA+** helps identify how different groups might be uniquely affected by a project, ensuring that these impacts are considered and addressed.

Community-Led Intersectional Gender Impact Assessments

While federal assessments are typically led by government bodies or the project proponent, **community-led intersectional gender impact assessments** are carried out by the impacted communities themselves or by civil society organizations within these communities (e.g., women's groups or Indigenous groups). These assessments can either be integrated into the

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¹⁹ *Ibid* at 15.



official government assessment process or conducted independently to influence the community's participation in the broader assessment.

The guide explains that community-led assessments are particularly valuable for ensuring that diverse voices within a community—especially those most marginalized—are heard. These assessments help identify how different identity factors (e.g., gender, age, race, disability) shape people's experiences with a project and can guide the development of strategies to mitigate or eliminate the negative impacts of the project, while expanding the benefits to more people.

Steps for conducting a community-led intersectional gender impact assessment include plan development, background research, community engagement, assessment drafting, using the assessment as a tool for change, and ongoing monitoring. The six steps are described further below.

Step 1: Plan Development

The first step in conducting a community-led intersectional gender impact assessment is developing a comprehensive project plan. This plan ensures that the assessment is designed effectively, centers the voices of the most impacted individuals, and is tailored to available resources. Key components of the plan include:

- **Goals**: Define the specific objectives of the assessment.
- **Scope**: Outline the focus and boundaries of the assessment.
- **Partners**: Identify collaborators who will assist in organizing and carrying out the assessment.
- **Intersectionality and Marginalization**: Ensure the assessment addresses gender and other identity factors, focusing on marginalized groups.
- **Methodology**: Plan the process for conducting background research, community engagement, data collection, assessment production, and ongoing analysis.
- **Protocols**: Establish clear protocols for free and informed consent, privacy, data ownership, and safeguarding concerns.



• **Budget and Resources**: Create a budget and fundraising plan to support the assessment.

Timing plays a critical role in shaping the assessment's structure. For example, if responding to a proposed project, begin the assessment early—ideally before or during the early phases of the federal impact assessment process. Alternatively, a baseline assessment can be done proactively, even before projects are proposed in an area. The scope and duration of the assessment will be influenced by available resources, with options ranging from short-term, low-cost assessments to long-term, resource-intensive projects.

Step 2: Background Research

The second step involves conducting extensive background research to inform the assessment. This phase helps gather essential information about the community, previous projects, and gendered dynamics to guide the assessment process. Key areas of background research include:

- Impacts of Similar Projects: Study how similar projects have impacted other communities.
- **Historical Data**: Research the community's experiences with previous projects and any barriers they faced in participating in past impact assessments.
- **Baseline Data**: Collect baseline information about the community before any projects begin, providing a foundation for monitoring future impacts.
- **Intersectional Gender Rights**: Investigate the history and current status of gender-based issues in the community, including violence or marginalization.
- **Division of Labor and Resources**: Explore gender-based disparities in labor, access to resources (e.g., housing, healthcare), and other factors like income and education.

By completing this background research, you can better understand the community's context and establish a clear baseline for future monitoring, ensuring that the assessment is well-informed and responsive to the community's needs.



Step 3: Community Engagement

Community engagement is a critical step after planning and research to involve diverse community members in the assessment process. It's essential to ensure that participation is voluntary, informed, and respectful of people's rights, values, and knowledge. This engagement helps identify both positive and negative impacts of a project, especially in relation to different genders and identities, and ensures that marginalized voices are included.

Key Points:

- 1. **Engaging Diverse Communities**: Efforts should be made to engage people from all identities, including gender, ethnicity, age, sexual orientation, and socio-economic status, recognizing that communities are not homogenous. Specific outreach is necessary for those who may be excluded from regular engagement processes.
- 2. **Indigenous Communities**: Special care should be taken when engaging Indigenous women, girls, and Two-Spirit people, who are often most affected by resource development projects. The engagement should respect Indigenous knowledge, culture, and practices, and include principles like free, prior, and informed consent.
- 3. **Community Representation**: The assessment team should be diverse, including local leaders and community members from different genders and identities, ensuring everyone feels comfortable and heard. Community engagement can be led by local members or external individuals depending on community dynamics.
- 4. **Engagement Techniques**: Engagement methods should be flexible, rights-based, and trauma-informed. Approaches should be participatory, transparent, and tailored to each person's needs, with a focus on making the process accessible to everyone.
- 5. **Barriers to Participation**: Identifying and addressing barriers to participation is crucial. These barriers vary across communities, and strategies should be developed to ensure that people can participate regardless of their circumstances.
- 6. **Data Collection and Ethics**: Data must be collected with careful attention to consent, confidentiality, and ethical considerations. Participants should be informed about how their data will be used, and all data should be stored securely.
- 7. **Support and Safety**: Protecting the well-being of participants and facilitators is essential. This includes providing support for trauma survivors, ensuring security, and



practicing self-care throughout the process. Safeguarding measures should be in place to prevent abuse or harm during engagement.

Overall, community engagement in this context should prioritize inclusivity, respect for diverse identities, and the well-being of participants, ensuring that the assessment is as comprehensive, ethical, and impactful as possible

Step 4: Assessment Drafting

Once community engagement and information gathering are complete, the next phase involves processing, analyzing, and refining the collected data. Here's a summary of what needs to be done:

- 1. **Transcribe Meetings**: Convert audio/video recordings from meetings into written form. This allows for a detailed review of the discussions and helps identify gaps and trends in the information.
- 2. **Review Data**: Examine the collected data from both community engagement and background research. Organize your findings into summaries and identify gaps or trends. Be sure to discard irrelevant information and maintain confidentiality.
- Validate Information: Ensure the data's accuracy by checking for inconsistencies or conflicting facts. Cross-check information with at least two other sources to confirm its validity.
- 4. **Identify Missing Information**: Assess whether the data represents the entire community, particularly different genders and identities. Reflect on any underrepresented voices or groups and aim to fill these gaps.
- 5. **Fill Gaps**: If any important information is missing, conduct additional research or engage with community members or groups that were not adequately represented in the initial stages. This could involve meeting with marginalized groups or revisiting earlier discussions.
- 6. **Collate Data**: Organize quantitative data in a structured format (e.g., spreadsheets), ensuring to break it down by relevant identity factors to capture the full scope of impacts.



- 7. **Data Analysis**: Analyze the data to identify how different genders and identities may be impacted by the project. This includes assessing potential positive and negative effects, and identifying practical recommendations to minimize inequality.
- 8. **Reflection**: Reflect on the process and challenges faced, documenting lessons learned and next steps for the assessment team.
- 9. **Discuss Findings with the Community**: Before finalizing the assessment, present a draft of the findings to community members, gathering their feedback. This is an opportunity to confirm the findings resonate with people's lived experiences and ensure all voices are represented.

Step 5: Use the Assessment as a Tool for Change

After the assessment is complete, it is essential to ensure it does not simply sit unused. The assessment must be actively shared and used to push for change:

- 1. **Share the Assessment**: Distribute the assessment to all relevant parties, including governments, the proponent, and community members. Use this as an opportunity to hold meetings and discuss the findings.
- 2. **Make It Available Online**: Ensure the assessment is accessible to the public by posting it on relevant websites, and encouraging non-governmental organizations (NGOs) to share it as well.
- 3. **Social Media Promotion**: Continue promoting the assessment on social media, ensuring it remains visible, especially around key dates or milestones in the project process.
- 4. **Sustained Media Coverage**: Cultivate relationships with journalists to keep the assessment and its findings in the public eye. Provide timely information that relates to news events to maintain media interest.
- 5. **Fuel Advocacy**: Use the findings and recommendations to support advocacy efforts aimed at influencing decision-makers, ensuring the assessment leads to concrete changes.

These steps ensure that the assessment is not just a report, but an active tool that drives continued advocacy and engagement with the project's impact.



Step 6: Ongoing Monitoring

Ongoing monitoring is crucial for tracking the actual impacts of a project on the community over time, particularly in relation to gender and identity factors. It helps ensure accountability and allows for adjustments to be made as needed to prevent and address potential human rights harms. Below is a summary of key considerations for effective ongoing monitoring:

1. Scope:

- Determine whether the monitoring will cover all impacts of the project or focus on specific critical impacts.
- Consider whether to monitor all people or prioritize sub-groups that are most affected by the project, such as those from marginalized communities.

2. Frequency:

- Define how often the monitoring will occur based on the project's lifecycle and when impacts are expected to be measurable.
- Align the monitoring frequency with community needs and available resources, as well as the capacity of the monitoring team.

3. Partnerships:

- Identify potential partners for the monitoring process, such as academic institutions, NGOs, or organizations that trained community members.
- Ensure diversity and community representation in the monitoring team, just as was done in the initial assessment.

4. Resources:

 Plan for how the monitoring process will be funded, especially considering the need for multi-year funding for long-term monitoring efforts.

5. **Presentation**:

- Decide how to present the monitoring findings. Consider various formats, such as a report card, an evaluation of progress on initial recommendations, or multimedia tools like podcasts, videos, or infographics.
- Plan how to share the findings with decision-makers and the public, ensuring that they are used effectively for ongoing advocacy.



Ongoing monitoring is essential for ensuring that the issues identified in the initial assessment are addressed, that recommendations are followed through, and that any new challenges or emerging issues are promptly identified and tackled.

Integrating GBA+ frameworks into impact assessments – whether through the *Indigenous Gender-Based Analysis Plus (IGBA+) Toolkit* or community-led approaches like Oxfam Canada's *Inspiring Change* – ensures that the diverse experiences of marginalized groups, including Indigenous women, gender-diverse individuals, and other vulnerable populations, are central to decision-making processes. By recognizing the intersectional nature of impacts and actively involving affected communities, these frameworks promote more inclusive, equitable and sustainable development outcomes. Ultimately, they foster a deeper understanding of how development projects shape lives, supporting not only immediate mitigation of harm but also long-term empowerment and resilience within impacted communities.